

SUP-E-11-02

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IDAHO PUBLIC UTILITIES COMMISSION

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Attorneys for Intervenor Rocky Mountain Power

**IN THE SUPREME COURT OF THE STATE OF IDAHO**

IN THE MATTER OF THE APPLICATION OF  
ROCKY MOUNTAIN POWER FOR  
APPROVAL OF A POWER PURCHASE  
AGREEMENT BETWEEN RMP AND CEDAR  
CREEK WIND, LLC (RATTLESNAKE  
CANYON PROJECT)

IN THE MATTER OF THE APPLICATION OF  
ROCKY MOUNTAIN POWER FOR  
APPROVAL OF A POWER PURCHASE  
AGREEMENT BETWEEN RMP AND CEDAR  
CREEK WIND, LLC (COYOTE HILL  
PROJECT)

IN THE MATTER OF THE APPLICATION OF  
ROCKY MOUNTAIN POWER FOR  
APPROVAL OF A POWER PURCHASE  
AGREEMENT BETWEEN RMP AND CEDAR  
CREEK WIND, LLC (NORTH POINT  
PROJECT)

IN THE MATTER OF THE APPLICATION OF  
ROCKY MOUNTAIN POWER FOR  
APPROVAL OF A POWER PURCHASE

SUPREME COURT NO.  
\_\_\_\_\_

IDAHO PUBLIC UTILITIES  
COMMISSION NOS.

PAC-E-11-01

PAC-E-11-02

PAC-E-11-03

PAC-E-11-04

PAC-E-11-05

**PETITION FOR  
INTERVENTION**

**PETITION FOR INTERVENTION**

AGREEMENT BETWEEN RMP AND CEDAR )  
 CREEK WIND, LLC (STEEP RIDGE PROJECT) )  
 )  
 IN THE MATTER OF THE APPLICATION OF )  
 ROCKY MOUNTAIN POWER FOR )  
 APPROVAL OF A POWER PURCHASE )  
 AGREEMENT BETWEEN RMP AND CEDAR )  
 CREEK WIND, LLC (FIVE PINE PROJECT) )  
 )  
 CEDAR CREEK WIND, LLC, )  
 )  
 Petitioner-Appellant, )  
 )  
 v. )  
 )  
 IDAHO PUBLIC UTILITIES COMMISSION, )  
 )  
 Respondent. )

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COMES NOW, PacifiCorp dba Rocky Mountain Power (“Rocky Mountain Power” or the  
 “Company”) through counsel and pursuant to Rule 7.1 of the Idaho Appellate Rules and hereby  
 petitions the Supreme Court for Leave to Intervene as a party to this appeal. In support of this  
 Petition, Rocky Mountain Power states and represents as follows:

(1) Rocky Mountain Power has a direct and substantial interest in this proceeding as the  
 party entering into the power purchase agreements with Cedar Creek Wind, LLC, (“Cedar  
 Creek”) for the purchase of the output from Cedar Creek’s proposed facilities.

(2) Rocky Mountain Power is the party who initiated the five cases before the Idaho  
 Public Utilities Commission (“IPUC”) by filing the power purchase agreements for approval  
 with the IPUC.

(3) Rocky Mountain Power has a direct and substantial interest and will be affected by  
 the outcome of this appeal. Without the opportunity to intervene, Rocky Mountain Power would  
 be without a manner or means of participating in the lawful determination of issues determined

by the IPUC which result will affect the rates Rocky Mountain Power and its customers pay for electricity in the state of Idaho.

WHEREFORE, Rocky Mountain Power respectfully requests that the Court exercise its discretion and grant Rocky Mountain Power Leave to Intervene as a party Respondent and thereafter be a party to the appeal for all purposes.

RESPECTFULLY SUBMITTED this 4<sup>th</sup> day of October, 2011.

ROCKY MOUNTAIN POWER



Richard R. Hall

Mark C. Moench

Daniel E. Solander

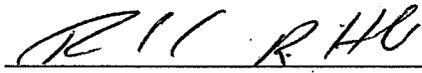
Attorneys for Rocky Mountain Power

VERIFICATION

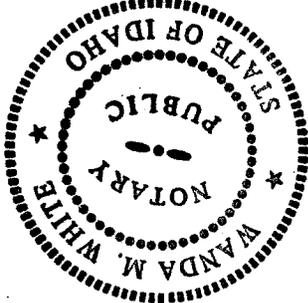
STATE OF IDAHO        )  
                                  :SS.  
COUNTY OF ADA        )

I, RICHARD R. HALL, being first duly sworn, upon my oath state that I am authorized to verify this Petition for Intervention on party Intervenor's behalf, that I have read the foregoing Petition, that I know the contents thereof, and that the facts stated therein are true and correct to the best of my knowledge and belief.

DATED this 4<sup>th</sup> of October, 2011.

  
\_\_\_\_\_  
RICHARD R. HALL

SUBSCRIBED AND SWORN TO before me this 4<sup>th</sup> day of October, 2011.



  
\_\_\_\_\_  
NOTARY PUBLIC FOR Idaho  
Residing in: *Boise, Ada Cty.*  
My Commission Expires: *7-30-14*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 4<sup>th</sup> October, 2011, I served a true and correct complete copy of the foregoing PETITION FOR INTERVENTION on the following, in the manner indicated below:

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