

LAW OFFICES OF

**RACINE OLSON NYE BUDGE & BAILEY  
CHARTERED**

201 EAST CENTER STREET  
POST OFFICE BOX 1391  
POCATELLO, IDAHO 83204-1391

TELEPHONE (208) 232-6101  
FACSIMILE (208) 232-6109

[www.racinelaw.net](http://www.racinelaw.net)

SENDER'S E-MAIL ADDRESS: [elo@racinelaw.net](mailto:elo@racinelaw.net)

W. MARCUS W. NYE  
RANDALL C. BUDGE  
JOHN A. BAILEY, JR.  
JOHN R. GOODELL  
JOHN B. INGELSTROM  
DANIEL C. GREEN  
BRENT O. ROCHE  
KIRK B. HADLEY  
ERIC L. OLSEN  
CONRAD J. AIKEN  
RICHARD A. HEARN, M.D.  
DAVID E. ALEXANDER  
LANE V. ERICKSON  
PATRICK N. GEORGE  
SCOTT J. SMITH  
STEPHEN J. MUHONEN  
BRENT L. WHITING  
JUSTIN R. ELLIS  
JOSHUA D. JOHNSON  
JONATHAN S. BYINGTON  
DAVE BAGLEY  
CAROL TIPPI VOLYN  
THOMAS J. BUDGE  
CANDICE M. MCHUGH  
JONATHAN M. VOLYN  
MARK A. SHAFFER

**BOISE OFFICE**  
101 SOUTH CAPITOL  
BOULEVARD, SUITE 208  
BOISE, IDAHO 83702  
TELEPHONE: (208) 395-0011  
FACSIMILE: (208) 433-0167

**IDAHO FALLS OFFICE**  
477 SHOUP AVENUE  
SUITE 203A  
IDAHO FALLS, ID 83402  
TELEPHONE: (208) 528-6101  
FACSIMILE: (208) 528-6109

**COEUR D'ALENE OFFICE**  
250 NORTHWEST  
BOULEVARD, SUITE 106A  
COEUR D'ALENE, ID 83814  
TELEPHONE: (208) 765-6888

**ALL OFFICES TOLL FREE**  
(877) 232-6101

LOUIS F. RACINE (1917-2005)  
WILLIAM D. OLSON, OF COUNSEL

September 25, 2008

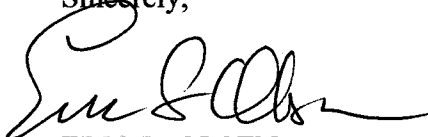
Jean D. Jewell, Secretary  
Idaho Public Utilities Commission  
PO Box 83720  
Boise, Idaho 83720-0074

Re: Case No. PAC-E-08-07

Dear Mrs. Jewell:

Enclosed for filing in the captioned matter, please find the original and seven copies of *Petition of Idaho Irrigation Pumpers Association, Inc.'s Leave to Intervene*.

Sincerely,

  
ERIC L. OLSEN

ELO:nj  
Enclosures  
cc: Service List

RECEIVED  
2008 SEP 29 AM 8:27  
IDAHO PUBLIC  
UTILITIES COMMISSION

Eric L. Olsen, ISB No. 4811  
RACINE, OLSON, NYE, BUDGE &  
BAILEY, CHARTERED  
P.O. Box 1391; 201 E. Center  
Pocatello, Idaho 83204-1391  
Telephone: (208) 232-6101  
Fax: (208) 232-6109

RECEIVED  
2008 SEP 29 AM 8:27  
IDAHO PUBLIC  
UTILITIES COMMISSION

Attorneys for Intervenor  
Idaho Irrigation Pumpers Association, Inc.

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF THE APPLICATION OF )  
ROCKY MOUNTAIN POWER FOR )  
APPROVAL OF CHANGES TO ITS )  
ELECTRIC SERVICE SCHEDULES )  
\_\_\_\_\_ )  
\_\_\_\_\_ )

**CASE NO. PAC-E-08-07**

**PETITION OF IDAHO IRRIGATION PUMPERS ASSOCIATION, INC.,**  
**FOR LEAVE TO INTERVENE**

COMES NOW Idaho Irrigation Pumpers Association, Inc., herein called "this Intervenor" and pursuant to Rule 72 of the rules of Procedure of the Idaho Public Utility Commission, and by this Petition asks leave to intervene herein and to appear and participate as a party herein, and as basis therefor states as follows:

(1) The name and address of this Intervenor is:

Idaho Irrigation Pumpers Association, Inc.  
c/o Lynn Tominaga  
P.O. Box 2624  
Boise, Idaho 83701-2624

This Intervenor will be represented by:

Eric L. Olsen  
Racine, Olson, Nye, Budge &  
Bailey, Chartered  
P.O. Box 1391; 201 E. Center  
Pocatello, Idaho 83204-1391

and requests that copies of all pleadings and production requests and responses should be provided to the following:

Eric L. Olsen  
Racine, Olson, Nye, Budge &  
Bailey, Chartered  
P.O. Box 1391; 201 E. Center  
Pocatello, Idaho 83204-1391  
Telephone: (208) 232-6101  
Fax: (208) 232-6109  
E-mail: [elo@racinelaw.net](mailto:elo@racinelaw.net)

Anthony Yankel  
29814 Lake Road  
Bay Village, Ohio 44140  
Fax: 440-808-1450  
E-mail: [tony@yankel.net](mailto:tony@yankel.net)

(2) This Intervenor and its members have a direct and substantial interest in this proceeding and intend to participate in all respects herein as a party as may be required to represent its interests.

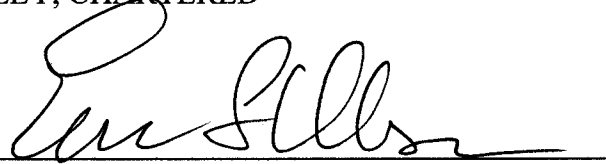
(3) Without the opportunity to intervene herein, this Intervenor would be without a manner or means of participating in the lawful determination of issues which will result in affecting its rates for electric service.

WHEREFORE, this Intervenor requests that this Commission confirm this Intervenor's leave to intervene in these proceedings and to appear and participate in all matters as may be necessary and appropriate; and to present evidence, call and examine witnesses, cross-examine witnesses, present argument, and to otherwise fully participate in the proceedings.

DATED this 25<sup>th</sup> day of September, 2008.

RACINE, OLSON, NYE, BUDGE &  
BAILEY, CHARTERED

By



ERIC L. OLSEN

**CERTIFICATE OF MAILING**

I HEREBY CERTIFY that on this 25<sup>th</sup> day of September, 2008, I served a true, correct and complete copy of the foregoing document, to each of the following, via the method so indicated:

Jean D. Jewell, Secretary  
Idaho Public Utilities Commission  
P.O. Box 83720  
472 W. Washington Street  
Boise, Idaho 83720-0074  
[jjewell@puc.state.id.us](mailto:jjewell@puc.state.id.us)

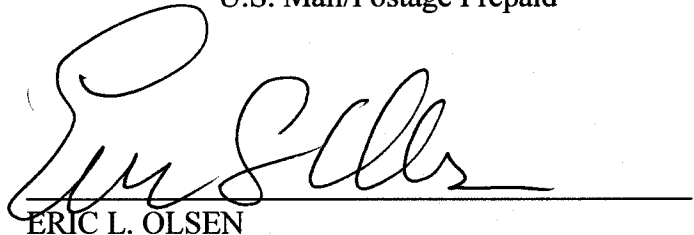
U.S. Mail/Postage Prepaid

Daniel E. Solander  
Yvonne R. Hogle  
Rocky Mountain Power  
201 South Main Street, Suite 2300  
Salt Lake City, UT 84111  
[daniel.solander@pacificorp.com](mailto:daniel.solander@pacificorp.com)  
[Yvonne.hogle@pacificorp.com](mailto:Yvonne.hogle@pacificorp.com)

U.S. Mail/Postage Prepaid

Ted Weston  
Rocky Mountain Power  
201 South Main, Suite 2300  
Salt Lake City, UT 84111  
[ted.weston@pacificorp.com](mailto:ted.weston@pacificorp.com)

U.S. Mail/Postage Prepaid



ERIC L. OLSEN