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2015 MAR -6 AM 11:02

IDAHO PUBLIC  
UTILITIES COMMISSION  
Chas. F. McDevitt  
Dean J. (Joe) Miller  
Celeste K. Miller

March 6, 2015

*Via Hand Delivery*

Jean Jewell, Secretary  
Idaho Public Utilities Commission  
472 W. Washington St.  
Boise, Idaho 83720

**Re: IPC-E-15-01**  
**AgPower Petition to Intervene and Joinder**

Dear Ms. Jewell:

Enclosed for filing in the above matter, please find an original and seven copies of AgPower DCD, LLC, and AgPower Jerome, LLC's Petition to Intervene and Joinder in Petitions to Clarify.

Kindly return a file stamped copy to me.

Very Truly Yours,  
McDevitt & Miller LLP



Dean J. Miller

DJM/hh  
Enclosures

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UTILITIES COMMISSION

*Attorneys for AgPower DCD, LLC, and AgPower Jerome, LLC*

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

<b>IN THE MATTER OF IDAHO POWER</b>	)	<b>CASE NO. IPC-E-15-01</b>
<b>COMPANY'S PETITION TO MODIFY</b>	)	
<b>TERMS AND CONDITIONS OF</b>	)	<b>AGPOWER DCD, LLC, AND</b>
<b>PROSPECTIVE PURPA ENERGY SALES</b>	)	<b>AGPOWER JEROME, LLC'S</b>
<b>AGREEMENTS.</b>	)	<b>PETITION TO INTERVENE AND</b>
	)	<b>JOINDER IN PETITIONS TO</b>
	)	<b>CLARIFY</b>
	)	

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COME NOW AgPower DCD, LLC, a Delaware Limited Liability Company and AgPower Jerome, LLC, a Delaware Limited Liability Company (collectively, AgPower) and petition to intervene in the above matter pursuant to the Commission's Rules of Practice and Procedure, IDAPA 31.01.01.071-.75. As discussed below, AgPower has a direct and substantial interest in these proceedings, and therefore the Commission should grant intervention.

**PETITION TO INTERVENE**

I.

AgPower DCD, LLC is a party, as seller, to a Firm Energy Sales Agreement (FESA), as amended, with Idaho Power Company (Idaho Power) in connection with an anaerobic digester electric power generating facility having a maximum capacity of 2.25 MW and energy deliveries of less than 10 aMW. It is known as the Bettencourt Dry Creek Biofactory. The FESA was first approved by the Commission in Case No. IPC-E-10-2, Order No. 31034.

ORIGINAL

AgPower Jerome, LLC is a party, as seller, to a Firm Energy Sales Agreement (FESA), as amended with Idaho Power in connection with an anaerobic digester electric power generating facility. It is known as the Double A Digester Project, having a maximum capacity of 4.5 MW and energy deliveries of less than 10 aMW. The FESA was first approved by the Commission in Case No. IPC-E-10-26, Order No. 32138.

II.

AgPower requests that all pleadings, correspondence, discovery, and other documents be served on the following:

Andrew Jackura  
Sr. Vice President North America  
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Camco Clean Energy  
9360 Station Street, Suite 375  
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[andrew.jackura@camcocleanenergy.com](mailto:andrew.jackura@camcocleanenergy.com)

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III.

This Petition is not timely pursuant to Order No. 32222; however, AgPower's participation will not broaden the issues, delay the proceedings or result in prejudice to any party.

IV.

Without the opportunity to intervene herein, AgPower would be without a manner or means of participating in the lawful determination of issues which may affect the avoided cost rates or contract terms and conditions regarding AgPower's present or future FESAs.

V.

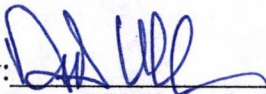
**JOINDER IN PETITIONS**

AgPower joins in the Petition to Clarify dated February 18, 2015 filed by Intermountain Energy Partners and the Cross Petition for Clarification dated February 25, 2015 filed by the Renewable Energy Coalition.

WHEREFORE, AgPower respectfully requests that the Commission issue an order granting its Petition to Intervene in the above-titled proceeding.

DATED this 6 day of March, 2015.

**AGPOWER DCD, LLC**  
**AGPOWER JEROME, LLC**

By:   
\_\_\_\_\_  
Dean J. Miller  
*Attorneys for AgPower*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 6<sup>th</sup> day of March, 2015, I caused to be served, via the method(s) indicated below, true and correct copies of the foregoing document, upon:

Jean Jewell, Secretary Idaho Public Utilities Commission 472 West Washington Street P.O. Box 83720 Boise, ID 83720-0074 <a href="mailto:jjewell@puc.state.id.us">jjewell@puc.state.id.us</a>	Hand Delivered U.S. Mail Fax Fed. Express Email	<input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
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Daphne Huang Deputy Attorney General Idaho Public Utilities Commission 472 West Washington Street P.O. Box 83720 Boise, ID 83720-0074 <a href="mailto:Daphne.Huang@puc.idaho.gov">Daphne.Huang@puc.idaho.gov</a>	Hand Delivered U.S. Mail Fax Fed. Express Email	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>
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Donovan E. Walker Regulatory Dockets Idaho Power Company 1221 West Idaho Street P.O. Box 70 Boise, ID 83707 <a href="mailto:dwalker@idahopower.com">dwalker@idahopower.com</a> <a href="mailto:dockets@idahopower.com">dockets@idahopower.com</a>	Hand Delivered U.S. Mail Fax Fed. Express Email	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>
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Benjamin J. Otto 710 N 6 <sup>th</sup> Street Boise, ID 83701 <a href="mailto:botto@idahoconservation.org">botto@idahoconservation.org</a>	Hand Delivered U.S. Mail Fax Fed. Express Email	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>
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