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IDAHO PUBLIC UTILITIES COMMISSION 201 South Main, Suite 2300 Salt Lake City, Utah 84111

February 10, 2015

### VIA OVERNIGHT DELIVERY

Jean D. Jewell Commission Secretary Idaho Public Utilities Commission 472 W. Washington Boise, ID 83702

# Re: Case No. IPC-E-15-01 IN THE MATTER OF IDAHO POWER COMPANY'S PETITION TO MODIFY TERMS AND CONDITIONS OF PROSPECTIVE PURPA ENERGY SALES AGREEMENTS

Dear Ms. Jewell:

Please find enclosed an original and seven (7) copies of Rocky Mountain Power's Petition to Intervene in the above referenced proceeding.

Formal correspondence and requests for additional information regarding this matter should be addressed to:

By E-mail (preferred):

By regular mail:

datarequest@pacificorp.com

Data Request Response Center PacifiCorp 825 NE Multnomah St., Suite 2000 Portland, OR 97232

Ted Weston Rocky Mountain Power 201 South Main, Suite 2300 Salt Lake City, Utah 84111 Telephone: (801) 220-2963 Fax: (801) 220-2798 Email: ted.weston@pacificorp.com

Daniel E. Solander Rocky Mountain Power 201 South Main Street, Suite 2400 Salt Lake City, Utah 84111 Telephone: (801) 220-4014 Fax: (801) 220-3299 Email: daniel.solander@pacificorp.com

Informal inquiries may be directed to Ted Weston, Idaho Regulatory Manager at (801) 220-2963.

Very truly yours,

Jeffrey K. Larsen / cm

Vice President, Regulation

CC: Service list

### **CERTIFICATE OF SERVICE**

I hereby certify that on this 10<sup>th</sup> of February, 2015, I caused to be served, via e-mail, a true and correct copy of the foregoing document in IPC-E-15-01 to the following:

Donovan E. Walker Idaho Power Company 1221 West Idaho Street P.O. Box 70 Boise, ID 83707 dwalker@idahopower.com

Leif Elgethum, PE, LLE AP InterMountain Energy Partners PO Box 7354 Boise, ID 83707 leif@sitebasedenergy.com

Peter J. Richardson Gregory M. Adams Richardson Adams, PLLC 515 N. 27<sup>th</sup> Street Boise, Idaho 83702 peter@richardsonadams.com greg@richardsonadams.com

Kelsey Jae Nunez Snake River Alliance 223 N. 6th St., Ste. 317 PO Box 1731 Boise, ID 83701 knunez@snakeriveralliance.org

Daniel Solander Rocky Mountain Power 201 S. Main Street, Suite 2400 Salt Lake City, Utah 84111 daniel.solander@pacificorp.com Benjamin I. Otto Idaho Conservation League 710 N. 6th St. Boise, Idaho 83702 botto@idahoconservation.org

Dean J. Miller McDevitt & Miller LLP 420 W. Bannock Street P.O. Box 2564-83701 Boise, ID 83702 joe@mcdevitt-miller.com

Dr. Don Reading 6070 Hill Road Boise, Idaho 83703 <u>dreading@mindspring.com</u>

Ted Weston Rocky Mountain Power 201 S. Main Street, Suite 2300 Salt Lake City, Utah 84111 Ted.weston@pacificorp.com

Data Request Response Center PacifiCorp 825 NE Multnomah Street, Suite 2000 Portland, Oregon 97232 <u>datarequest@pacificorp.com</u>

Carrie Meyer // Supervisor, Regulatory Operations

Daniel E. Solander (ISB# 8931) Yvonne R. Hogle (ISB# 8930) Rocky Mountain Power 201 S. Main St., Suite 2400 Salt Lake City, UT 84111 Telephone: (801) 220-4014 Daniel.solander@pacificorp.com Yvonne.hogle@pacificorp.com

#### **BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF IDAHO POWER	)		
COMPANY'S PETITION TO MODIFY TERMS	)	CASE NO. IPC-E-15-01	
AND CONDITIONS OF PROSPECTIVE PURPA	)		
ENERGY SALES AGREEMENTS	)		
	)	PETITION TO INTERVENE OF	
	)	ROCKY MOUNTAIN POWER	
	)		

## PETITION OF ROCKY MOUNTAIN POWER FOR LEAVE TO INTERVENE

COMES NOW PacifiCorp dba Rocky Mountain Power ("RMP" or the "Company") and

pursuant to Rule 71 of the Rules of Procedure of the Idaho Public Utility Commission, IDAPA

31.10.01074, and by this Petition asks for leave to intervene herein and to appear and participate

as a party herein, and as basis therefore states as follows:

1. The name and address of this Intervenor is:

Rocky Mountain Power 201 S. Main St., Suite 2400 Salt Lake City, UT 84111

This Intervenor will be represented by:

Daniel E. Solander Yvonne R. Hogle Rocky Mountain Power 201 S. Main St., Suite 2400 Salt Lake City, UT 84111 Informal inquiries related to this Petition may be directed to Ted Weston, Idaho Regulatory Affairs Manager, at (801) 220-2963. Formal correspondence and requests for additional information regarding this matter should be addressed to:

By E-mail (preferred):	datarequest@pacificorp.com	
By Fax:	(503) 813-6060	
By regular mail:	Data Request Response Center PacifiCorp 825 NE Multnomah, Suite 2000 Portland, OR 97232	
With copies to:	Daniel E. Solander Sr. Counsel Rocky Mountain Power 201 South Main St., Suite 2400 Salt Lake City, Utah 84111 daniel.solander@pacificorp.com	Ted Weston ID Regulatory Affairs Mgr Rocky Mountain Power 201 S. Main St., Suite 2300 Salt Lake City, UT 84111 ted.weston@pacificorp.com

2. RMP has a direct and substantial interest in this proceeding and intends to participate in all respects herein as a party as may be required to represent its interests.

3. RMP is an electric utility in the state of Idaho that is required pursuant to the terms of the Public Utility Regulatory Policies Act of 1978 to purchase power from qualifying facilities ("QFs"). Accordingly, RMP has an interest in the process for setting the terms, rates and conditions under which it is required to purchase the output from QFs in the state of Idaho. Without the opportunity to intervene herein, RMP would be without a manner or means of participating in the lawful determination of issues which will affect the rates and terms under which RMP's customers are required to pay for energy from QFs.

4. RMP intends to participate herein as a party, and if necessary, to introduce evidence, cross-examine witnesses, and be heard in argument. The nature and quality of

evidence that RMP will introduce is dependent on the nature and effect of other evidence in this proceeding.

5. Granting RMP's petition to intervene will not unduly broaden the issues in this case, nor will it prejudice any party to this case.

WHEREFORE, RMP requests that the Commission confirm RMP's leave to intervene in this proceeding, 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 these proceedings.

DATED this 10<sup>th</sup> day of February, 2015.

Daniel E. Solander Yvonne R. Hogle

Attorneys for Rocky Mountain Power