

Williams · Bradbury

A T T O R N E Y S A T L A W

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February 19, 2015

IDAHO PUBLIC
UTILITIES COMMISSION

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

Re: IPC-E-15-01

Dear Ms. Jewell:

Enclosed please find an original and seven copies of the following for filing in the above referenced docket:

1. Petition for Renewable Energy Coalition for Leave to Intervene, and
2. Motion for *Pro Hac Vice* Admission of Irion Sanger of the firm Sanger Law, P.C.

Please call should you have any questions.

Sincerely,



Ronald L. Williams

RLW/jr
Enclosures
cc: Service List

Ronald L. Williams, ISB No. 3034
Williams Bradbury, P.C.
1015 W. Hays St.,
Boise ID, 83702
Telephone: 208-344-6633
Fax: 208-344-0077
ron@williamsbradbury.com

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Irion Sanger
Applying Counsel
Sanger Law PC
1117 SE 53rd Avenue
Portland, OR 97215
Tel: (503) 756-7533
Fax: (503) 334-2235
irion@sanger-law.com

Counsel for Renewable Energy Coalition

BEFORE THE IDAHO PUBLIC UTILITES COMMISSION

IN THE MATTER OF IDAHO POWER)
COMPANY'S PETITION TO MODIFY)
TERMS AND CONDITIONS OF)
PROSPECTIVE PURPA ENERGY SALES)
AGREEMENTS)
_____)

Case No. IPC-E-15-01

**PETITION OF RENEWABLE
ENERGY COALITION FOR LEAVE
TO INTERVENE**

Pursuant to Rules 71 through 76 of the Idaho Public Utilities

Commission's Rules of Practice and Procedure, IDAPA 31.01.01. 071 *et. seq.*,

Renewable Energy Coalition ("REC") petitions the Idaho Public Utilities Commission

(the "Commission") for leave to intervene. In support of this Petition, REC states as

follows:

1. The name and address of REC is:

Renewable Energy Coalition
c/o John Lowe
12050 SW Tremont Court
Portland, OR 97225

E-Mail: jravenesanmarcos@yahoo.com

2. REC will be represented in this proceeding by Williams Bradbury,

P.C. All documents relating to these proceedings should be served on the following persons at the addresses listed:

Ronald L. Williams
Williams Bradbury, P.C.
1015 W. Hays St.
Boise ID, 83702
Telephone: 208-344-6633
Facsimile: 208-344-0077
E-mail: ron@williamsbradbury.com

Irion Sanger
Sanger Law, P.C.
1117 SW 53rd Avenue
Portland, OR 97215
E-Mail: irion@sanger-law.com

3. REC is a coalition of Idaho and northwest small hydro qualifying facility (“QF”) power producers that have power purchase agreements (“PPAs”) with Idaho investor owned utilities, or who may seek PPAs with Idaho utilities. REC has a direct and substantial interest in this proceeding that will not be adequately represented by any other party, and in any Commission determination made in connection with these proceedings that could impact avoided cost rates or contract terms and conditions available to REC members. REC intends to participate in all aspect of this proceeding and will not unreasonably broaden the issues, burden the record, or delay this proceeding.

4. Without the opportunity to intervene herein, REC 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 PPAs for REC members.

WHEREFORE, REC respectfully requests that the Commission grant its petition to intervene with full party status 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 the proceedings.

Dated this 19 day of February, 2015.

Respectfully submitted,



Ronald L. Williams
Williams Bradbury, P.C.
Attorneys for PIIC

CERTIFICATE OF DELIVERY

I HEREBY CERTIFY that on this 19th day of February, 2015, I caused to be served a true and correct copy of the foregoing document upon the following individuals in the manner indicated below:

Donovan E. Walker
Idaho Power Company
1221 West Idaho Street
PO Box 70
Boise, ID 83707
E-Mail: dwalker@idahopower.com

- Hand Delivery
- US Mail (postage prepaid)
- Facsimile Transmission
- Federal Express
- Electronic Transmission

Peter J. Richardson
Gregory M. Adams
Richardson Adams, PLLC
PO Box 7218
Boise, ID 83702
E-Mail: peter@richardsonadams.com
greg@richardsonadams.com
Attorneys for J.R. Simplot Company

- Hand Delivery
- US Mail (postage prepaid)
- Facsimile Transmission
- Federal Express
- Electronic Transmission

Dr. Don Reading
6070 Hill Road
Boise, ID 83703
E-Mail: dreading@mindspring.com
J.R. Simplot Company

- Hand Delivery
- US Mail (postage prepaid)
- Facsimile Transmission
- Federal Express
- Electronic Transmission

Benjamin J. Otto
Idaho Conservation League
710 N. 6th Street
Boise, ID 83702
E-Mail: botto@idahoconservation.org

- Hand Delivery
- US Mail (postage prepaid)
- Facsimile Transmission
- Federal Express
- Electronic Transmission

Dean J. Miller
McDevitt & Miller LLP
420 West Bannock Street
PO Box 2564 -83701
Boise, ID 83702
E-Mail: joe@mcdevitt-miller.com
**Attorneys for Intermountain Energy
Partners, LLC**

- Hand Delivery
- US Mail (postage prepaid)
- Facsimile Transmission
- Federal Express
- Electronic Transmission

Leif Elgethun, PE, LEED AP
Intermountain Energy Partners, LLC
PO Box 7354
Boise, ID 83707
E-Mail: leif@sitebasedenergy.com

- Hand Delivery
- US Mail (postage prepaid)
- Facsimile Transmission
- Federal Express
- Electronic Transmission

Kelsey Jae Nunez
Snake River Alliance
223 N. 6th Street, Suite 317
PO Box 1731
Boise, ID 83701
E-Mail: knunez@snakeriveralliance.org

- Hand Delivery
- US Mail (postage prepaid)
- Facsimile Transmission
- Federal Express
- Electronic Transmission

Daniel E. Solander
Sr. Counsel
Rocky Mountain Power
201 South Main Street, Suite 2400
Salt Lake City, UT 84111
E-Mail: daniel.solander@pacificorp.com

- Hand Delivery
- US Mail (postage prepaid)
- Facsimile Transmission
- Federal Express
- Electronic Transmission

Ted Weston
ID Regulatory Affairs Manager
Rocky Mountain Power
201 South Main Street, Suite 2300
Salt Lake City, UT 84111
E-Mail: ted.weston@pacificorp.com

- Hand Delivery
- US Mail (postage prepaid)
- Facsimile Transmission
- Federal Express
- Electronic Transmission

Data Requests: datarequest@pacificorp.com

- Electronic Transmission

C. Tom Arkoosh
Arkoosh Law Offices
802 W. Bannock Street, Suite 900
PO Box 2900
Boise, ID 83701
E-Mail: tom.arkoosh@arkoosh.com
**Attorneys for Twin Falls Canal Company,
North Side Canal Company and American
Falls Reservoir District No. 2**

- Hand Delivery
- US Mail (postage prepaid)
- Facsimile Transmission
- Federal Express
- Electronic Transmission

John Lowe
Renewable Energy Coalition
12050 S.W. Tremont Court
Portland, OR 97225
E-Mail: jravenesanmarcos@yahoo.com

- Hand Delivery
- US Mail (postage prepaid)
- Facsimile Transmission
- Federal Express
- Electronic Transmission

Irion Sanger
Sanger Law, P.C.
1117 SW 53rd Avenue
Portland, OR 97215
E-Mail: irion@sanger-law.com
**Co-Counsel for Renewable Energy
Coalition**

- Hand Delivery
- US Mail (postage prepaid)
- Facsimile Transmission
- Federal Express
- Electronic Transmission



Ronald L. Williams