

Peter J. Richardson (ISB No. 3195)
Gregory M. Adams (ISB No. 7454)
Richardson Adams, PLLC
515 N. 27th Street
Boise, Idaho 83702
Telephone: (208) 938-7900
Fax: (208) 938-7904
peter@richardsonadams.com
greg@richardsonadams.com

RECEIVED
2015 FEB -2 PM 3:49
IDAHO PUBLIC
UTILITIES COMMISSION

Attorneys for the J. R. Simplot Company

BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER)
COMPANY’S PETITION TO MODIFY) CASE NO. IPC-E-15-01
TERMS AND CONDITIONS OF)
PROSPECTIVE PURPA ENERGY SALES) PETITION TO INTERVENE
AGREEMENTS.) OF THE J. R. SIMPLOT COMPANY
_____)

COMES NOW, The J. R. Simplot Company, hereinafter referred to as “Intervenor,” and pursuant to this Commission’s Rule of Procedure, Rule 071, IDAPA 31.10.01074, hereby petitions the Commission for leave to intervene herein and to appear and participate herein as a party, and as grounds therefore states as follows:

1. The name and address of this Intervenor is:

J. R. Simplot Company
Attn: Don Sturtevant
P.O. Box 27
Boise, ID 83707

///

///

///

2. This Intervenor will be represented herein by:

Peter J. Richardson (ISB No. 3195)
Gregory M. Adams (ISB No. 7454)
Richardson Adams, PLLC
515 N. 27th Street
Boise, Idaho 83702
Telephone: (208) 938-7900
Fax: (208) 938-7904
peter@richardsonadams.com
greg@richardsonadams.com

3. Copies of all pleadings, production requests, production responses, Commission orders and other documents should be provided to:

Peter J. Richardson (ISB No. 3195)
Gregory M. Adams (ISB No. 7454)
Richardson Adams, PLLC
515 N. 27th Street
Boise, Idaho 83702
Telephone: (208) 938-7900
Fax: (208) 938-7904
peter@richardsonadams.com
greg@richardsonadams.com

Dr. Don Reading
6070 Hill Road
Boise, Idaho 83703
(208) 342-1700
dreading@mindspring.com

4. This Intervenor, the J. R. Simplot Company is a corporation duly qualified to do business in the State of Idaho.

5. The J. R. Simplot Company currently operates a qualifying facility (“QF”) at its operations in Pocatello, Idaho, which utilizes waste heat in an industrial cogeneration process and has a nameplate capacity of 15.9 megawatts (“MW”). It has a PURPA contract providing

for Idaho Power to purchase the output of that plant and recently entered into a one-year replacement contract for that PURPA facility.

6. In addition, J.R. Simplot Company is pursuing other energy projects on its properties in Idaho with the goal of obtaining PURPA contracts with Idaho Power and possibly other utilities. J.R. Simplot Company recently contacted Idaho Power to request indicative pricing for a 25-MW cogeneration QF to be developed at the new Idaho Project potato processing facility in Caldwell, Idaho.

7. The J.R. Simplot Company therefore claims a direct and substantial interest in this proceeding because its ability to make such sales will be affected by the outcome of this proceeding where Idaho Power proposes to modify the terms and conditions of prospective energy sales agreements for facilities that are ineligible for standard avoided cost rates.

8. This Intervenor intends to participate herein as a party, and if necessary, to introduce evidence, cross-examine witnesses, call and examine witnesses, and be heard in argument. The nature and quality of evidence which this Intervenor will introduce is dependent upon the nature and effect of other evidence in this proceeding.

9. Without the opportunity to intervene herein, this Intervenor would be without any means of participation in this proceeding which may have a material impact on its ability to enter into PURPA contracts in the State of Idaho.

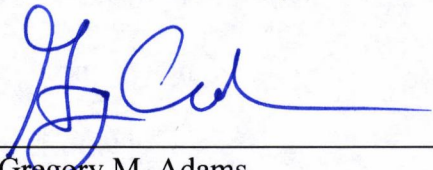
10. Granting this Intervenor's petition to intervene will not unduly broaden the issues nor will it prejudice any party to this case.

WHEREFORE, the J. R. Simplot Company respectfully requests that this Commission grant its Petition 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, present argument and to otherwise fully participate in these proceedings.

DATED this 2nd day of February, 2015.

RICHARDSON ADAMS, PLLC

By 

Gregory M. Adams
Of Attorneys for the J.R. Simplot Co.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 2nd day of February, 2015, a true and correct copy of the within and foregoing PETITION TO INTERVENE OF THE J. R. SIMPLOT COMPANY, Case No. IPC-E-15-01, was served by U.S. Mail, postage prepaid, to:

Donovan Walker
Idaho Power Company
1221 West Idaho Street (83702)
PO Box 70
Boise, Idaho 83707-0070
dwalker@idahopower.com



Nina Curtis
Legal Assistant