

### **Department of Energy**

Washington, DC 20585

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2011 JUN 20 AM 9: 16

IDAHO PUBLIC UTILITIES COMMISSION

Ms. Jean D. Jewell, Secretary Idaho Public Utilities Commission 472 West Washington Street P.O. Box 83720 Boise, Idaho 83720-0074

June 17, 2011

Re: Case No. IPC-E-11-08
United States Department of Energy's Petition for Leave to Intervene

Dear Ms. Jewell:

An original and seven (7) copies of the United States Department of Energy's Petition for Leave to Intervene in the above-captioned proceeding are enclosed herewith for filing. At your convenience, please date stamp and return the enclosed extra copy of the petition. The petition has been transmitted to the parties via electronic email.

Thank you for your kind attention.

Very truly yours,

Arthur Perry Bruder
Attorney for the

Dun Dunke

United States Department of Energy 1000 Independence Avenue SW

Washington, DC 20585 arthur.bruder@hq.doe.gov

phone: (202) 586-3409 cell: (202) 329-4966

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#### BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

2011 JUN 20 AM 9: 16

IN THE MATTER OF THE APPLICATION OF	IDAHO PUBLIC UTILITIES COMMISSION
IDAHO POWER COMPANY FOR AUTHORITY	)
TO INCREASE ITS RATES AND CHARGES	) CASE NO. IPC-E-11-08
FOR ELECTRIC SERVICE TO ELECTRIC	
CUSTOMERS IN THE STATE OF IDAHO	

# THE UNITED STATES DEPARTMENT OF ENERGY'S PETITION FOR LEAVE TO INTERVENE

COMES NOW, the United States Department of Energy, ("the Department" or "DOE") and, pursuant to Rule 72 of the Commission's rules of procedure and by this petition, asks leave to intervene, and to appear and participate as a party, herein. As grounds for this petition, the Department states that:

(1) Its name and address are:

The United States Department of Energy 1000 Independence Ave. SW Washington, DC 20585

(2) The Department will be represented by:

Steven A. Porter
Assistant General Counsel
Electricity and Fossil Energy
United States Department of Energy
1000 Independence Ave. SW
Washington, DC 20585
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Arthur Perry Bruder
Attorney -Advisor
United States Department of Energy
1000 Independence Ave. SW
Washington, DC 20585
Arthur.bruder@hq.doe.gov
Phone: (202) 586-3409
Fax: (202) 586-4116

(3) DOE requests that all pleadings, production requests and responses, orders and other documents be provided to Arthur Perry Bruder as indicated above, and to:

Mr. Dwight Etheridge **Exeter Associates** detheridge@exeterassociates.com 5565 Sterrett Place, Suite 310 Columbia, MD 21044 phone: (410) 992-4500

fax:

(410) 992-3445

(4) The Department's Idaho National Laboratory ("INEL") is one of Idaho Power Company's ("the Company") largest customers and one of the Company's four "special contract" customers, As such, DOE has a substantial interest in the outcome of this proceeding which cannot be adequately represented by any other party. The Company purposes to increase INEL's rate by \$1,191,668, or 14.95%. If DOE were denied the opportunity to intervene, it could not participate in the lawful determination of issues which will have a material effect upon the rates, terms and conditions under which it receives service;

(5) The Department intends to participate fully as a party herein in all respects that may be required for it to represent its interests, including, but not limited to, submission of direct and responsive testimony, examination and cross-examination of witnesses, submission of briefs, and presentation of and response to motions and oral argument.

WHEREFORE, the Department of Energy respectfully requests that this Commission grant this petition to intervene in this proceeding.

Arthur Perry Bruder

Office of the General Counsel

United States Department of Energy

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Washington, DC 20585

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phone: (202) 586-3409

cell:

(202) 329-4966

DATED this 17<sup>th</sup> day of June, 2011

#### CERTIFICATE OF SERVICE

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I HEREBY CERTIFY that on this 17th day of June, 2011, I served a true, correct and complete copy of the within and foregoing document, the United States Department of JUN 20 AM 9: 20 Energy's Petition for Leave to Intervene in IPC-E- 11-08, upon all of the parties of record in this proceeding, by:

UTILITIES COMMISSION

(1) delivering the original and seven copies of the document by overnight delivery service, properly addressed and prepaid, to:

Jean D. Jewell, Secretary Idaho Public Utilities Commission P.O. Box 83720 472 W. Washington Street Boise, Idaho 83720-0074

(2) transmitting the document via electronic mail to each of the following persons at the

email address shown:
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