Peter J. Richardson (ISB # 3195) Gregory M. Adams (ISB # 7454) Richardson & O'Leary, PLLC 515 N. 27th Street P.O. Box 7218 Boise, Idaho 83702 Telephone: (208) 938-7901 Fax: (208) 938-7904 peter@richardsonandoleary.com greg@richardsonandoleary.com RECEIVED

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Attorneys for the Industrial Customers of Idaho Power

BEFORE THE IDAHO

PUBLIC UTILITIES COMMISSION

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

PETITION TO INTERVENE OF THE INDUSTRIAL CUSTOMERS OF IDAHO POWER

COMES NOW, the Industrial Customers of Idaho Power ("ICIP"), hereinafter referred to

as "Intervenor," and pursuant to this Commission's Rules of Procedure, Rule 71 IDAPA

31.01.01.71 hereby petitions the Commission for leave to intervene herein and to appear and

participate herein as a party, and as grounds therefore states:

1. The name and address of this Intervenor is:

Industrial Customers of Idaho Power c/o Peter J. Richardson Richardson & O'Leary, PLLC 515 N. 27th St P.O. Box 7218 Boise, Idaho 83702 Telephone: (208) 938-7901 Fax: (208) 938-7904 peter@richardsonandoleary.com

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

> Dr. Don Reading 6070 Hill Road Boise, Idaho 83703 Telephone: (208) 342-1700 Fax: (208) 383-0401 dreading@mindspring.com

Peter J. Richardson Gregory M. Adams Richardson & O'Leary, PLLC 515 N. 27th Street P.O. Box 7218 Boise, ID 83702 Telephone: (208) 938-2236 Fax: (208) 938-7904 peter@richardsonandoleary.com greg@richardsonandoleary.com

2. This Intervenor, ICIP, is an unincorporated association of Schedule 19 customers of Idaho Power Company. All ICIP members receive electric utility services from Idaho Power Company. ICIP claims a direct and substantial interest in this proceeding because its members' rates for service from Idaho Power Company may be affected by the outcome of this proceeding.

3. This Intervenor, in its capacity as a representative of industrial customers, 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.

4. Without the opportunity to intervene herein, this Intervenor would be without adequate means of participation in this proceeding which may have a material impact on its electric rates and terms and conditions of service.

WHEREFORE, the Industrial Customers of Idaho Power 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 74 day of June, 2011.

RICHARDSON AND O'LEARY, PLLC

By: Bett. Kichado

Peter J. Richardson Gregory M. Adams Attorneys for the Industrial Customers of Idaho Power

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the <u>146</u> day of <u>Mary</u>, 2011, a true and correct copy of the within and foregoing PETITION TO INTERVENE OF THE INDUSTRIAL CUSTOMERS OF IDAHO POWER IN CASE NO.IPC-E-11-08 was served in the manner shown to:

Ms. Jean Jewell

Commission Secretary Idaho Public Utilities Commission P O Box 83720 Boise, ID 83720-0074

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Adams

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