

facilities currently serve internal needs, except the Nampa facility sells surplus generation to Idaho Power pursuant to Schedule 72 (IPC-E-06-29). The Amalgamated Sugar Company claims a direct and substantial interest in this proceeding in that its ability to make long term PURPA QF sales to Idaho Power may be affected by the outcome of this proceeding.

3. 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.

4. 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 make long term PURPA sales to Idaho Power.

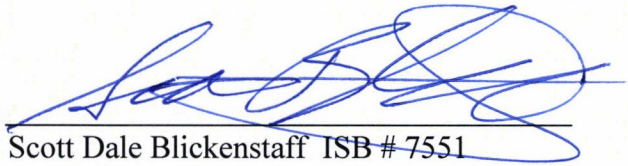
5. Granting this Intervenor's petition to intervene will not unduly broaden the issues nor will it prejudice any party to this case.

WHEREFORE, The Amalgamated Sugar 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.

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DATED this 20th day of February, 2015.

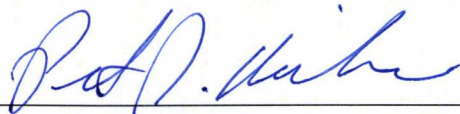
The Amalgamated Sugar Company LLC

By 
Scott Dale Blickenstaff ISB # 7551

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 20th day of February, 2015, a true and correct copy of the within and foregoing PETITION TO INTERVENE BY THE AMALGAMATED SUGAR COMPANY LLC was served by U.S. Mail:

Donovan Walker
Idaho Power Company
1221 West Idaho Street
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dwalker@idahopower.com

By: 

ADDENDUM TO CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 20th day of February, 2015, a true and correct copy of the within and foregoing PETITION TO INTERVENE BY THE AMALGAMATED SUGAR COMPANY LLC was served by U.S. Mail:

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