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IDAHO PUBLIC UTILITIES COMMISSION

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North Side Canal Company and
American Falls Reservoir District No. 2

BEFORE THE IDAHO PUBLIC UTILITIES 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 TO INTERVENE BY
TWIN FALLS CANAL COMPANY,
NORTH SIDE CANAL COMPANY
AND AMERICAN FALLS
RESERVOIR DISTRICT NO. 2**

TWIN FALLS CANAL COMPANY, NORTH SIDE CANAL COMPANY and
AMERICAN FALLS RESERVOIR DISTRICT NO. 2, collectively "Petitioners," hereby
petition to Commission for leave to intervene in the above-entitled proceedings pursuant
to Rules 71 through 75 of the Commission's Rules of Practice and Procedure, IDAPA 31-
01-01-072-075. Petitioners submit the following information in support of this Petition:

1. Petitioner's names and addresses are as follows:

**Twin Falls Canal Company
401 6th Avenue West
Twin Falls, ID 83301**

**North Side Canal Company
921 North Lincoln Avenue
Jerome, ID 83338**

**American Falls Reservoir District No. 2
409 N. Apple St.
Shoshone, ID 83352**

2. Petitioners' representatives for the purpose of service of pleadings and other written materials are:

**C. Tom Arkoosh
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To reduce costs and environmental impacts of exchanging information in this case, the Petitioners request that, pursuant to IPUC Rules, information other than that which might be deemed confidential or otherwise must be hand-delivered be provided electronically and/or via email to the above address.

3. This *Petition to Intervene* is timely.

4. Together, Twin Falls Canal Company, North Side Canal Company and American Falls Reservoir District No. 2 have good cause and a direct and substantial interest in the outcome of these proceedings and intends to participate in all respects herein as a party as may be required to represent their interests. Petitioners currently own interests in and operate qualifying facilities under the Public Utilities Regulatory Policy Act ("PURPA"). Additionally, Petitioners are pursuing other energy projects on their properties and canals in Idaho with the goal of obtaining PURPA contracts with Idaho

Power and possibly other utilities.

5. Petitioners desire to participate in this proceeding with full rights of a party to, if necessary, introduce evidence, cross-examine and participate in hearings or oral argument. The exact quantity of evidence to be introduced cannot be stated at this time, but Petitioners' participation will not unduly broaden the issues or cause delays. Petitioners agree to be bound by all scheduling orders existing in this docket prior to their intervention.

6. Petitioner's participation will not unduly broaden issues or prejudice any party to this case.

For these reasons, Twin Falls Canal Company, North Side Canal Company and American Falls Reservoir District No. 2 respectfully ask this Commission to grant their *Petition to Intervene*.

Respectfully Submitted,

DATED this 17th day of February, 2015.

ARKOOSH LAW OFFICES



C. Tom Arkoosh
Attorneys for Twin Falls Canal Company,
North Side Canal Company and
American Falls Reservoir District No. 2

CERTIFICATE OF MAILING

I HEREBY CERTIFY that on the 17th day of February, 2015, I served a true and correct copy of the foregoing document(s) upon the following person(s) by the means listed below:

Hand Delivered:

Jean Jewell
Commission Secretary (Original and seven copies)
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Boise, ID 83702

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