

Peter J. Richardson (ISB No. 3195)  
Gregory M. Adams (ISB No. 7454)  
Richardson Adams, PLLC  
515 N. 27<sup>th</sup> Street  
P.O. Box 7218  
Boise, Idaho 83702  
Telephone: (208) 938-7901  
Fax: (208) 938-7904  
[peter@richardsonadams.com](mailto:peter@richardsonadams.com)  
[greg@richardsonadams.com](mailto:greg@richardsonadams.com)

RECEIVED  
2015 FEB 18 PM 3:17  
IDAHO PUBLIC  
UTILITIES COMMISSION

Attorneys for Clearwater Paper Corporation

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 CLEARWATER PAPER
	)	CORPORATION
	)	
	)	
	)	

---

COMES NOW, the CLEARWATER PAPER CORPORATION, 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 as follows:

//

//

//

//

1. The name and address of this Intervenor is:

Clearwater Paper Corporation  
c/o Peter J. Richardson  
Richardson Adams, PLLC  
515 N. 27<sup>th</sup> St  
P.O. Box 7218  
Boise, Idaho 83702  
Telephone: (208) 938-7901  
Fax: (208) 938-7904  
[peter@richardsonadams.com](mailto:peter@richardsonadams.com)

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](mailto:dreading@mindspring.com)

Peter J. Richardson  
Gregory M. Adams  
Richardson Adams, PLLC  
515 N. 27<sup>th</sup> Street  
P.O. Box 7218  
Boise, ID 83702  
Telephone: (208) 938-2236  
Fax: (208) 938-7904  
[peter@richardsonadams.com](mailto:peter@richardsonadams.com)  
[greg@richardsonadams.com](mailto:greg@richardsonadams.com)

With an electronic copy to Carol Haugen, Clearwater Paper Corporation,  
[carol.haugen@clearwaterpaper.com](mailto:carol.haugen@clearwaterpaper.com).

2. This Intervenor, the Clearwater Paper Corporation is a customer of Avista Corporation (“Avista”) and currently owns generation facilities that are certified to sell electric energy and capacity as PURPA qualifying facilities at its facility near Lewiston, Idaho that are cumulatively capable of generating approximately 109 megawatts of energy. Clearwater Paper Corporation claims a direct and substantial interest in this proceeding in that the term for potential future sales from its generators as QFs may be limited as a result of the Commission’s actions in this matter. In addition, Avista Corporation has petitioned to intervene with the intent

of expanding the reach of the Commission's action in this matter to also include PURPA sales to Avista.

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.


5. 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 terms electric sales to Avista.

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

**WHEREFORE**, the Clearwater Paper Corporation 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 18th day of February, 2015.

RICHARDSON ADAMS, PLLC

By   
Peter J. Richardson

Of Attorneys for Clearwater Paper  
Corporation

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 18th day of February, 2015, a true and correct copy of the within and foregoing PETITION TO INTERVENE BY CLEARWATER PAPER CORPORATION was served as shown to:

Jean D. Jewell, Secretary  
Idaho Public Utilities Commission  
472 West Washington  
Boise, Idaho 83702  
[jean.jewell@puc.idaho.gov](mailto:jean.jewell@puc.idaho.gov)

Hand Delivery  
 U.S. Mail, postage pre-paid  
 Facsimile  
 Electronic Mail

C. Tom Arkoosh  
Twin Falls Canal Company  
North Side Canal Company  
American Falls Reservoir District #2  
Arkoosh Law Offices  
802 W Bannock Ste 900  
Boise ID 83702  
[tom.arkoosh@arkoosh.com](mailto:tom.arkoosh@arkoosh.com)

Hand Delivery  
 U.S. Mail, postage pre-paid  
 Facsimile  
 Electronic Mail

Ben Otto  
Idaho Conservation League  
710 N 6<sup>th</sup>  
Boise ID 83702  
[botto@idahoconservation.org](mailto:botto@idahoconservation.org)

Hand Delivery  
 U.S. Mail, postage pre-paid  
 Facsimile  
 Electronic Mail

Leif Elgethun PE LEED AP  
Intermountain Energy Partners LLC  
PO Box 7354  
Boise ID 83707  
[leif@sitebasedenergy.com](mailto:leif@sitebasedenergy.com)

Hand Delivery  
 U.S. Mail, postage pre-paid  
 Facsimile  
 Electronic Mail

Dean J Miller  
McDevitt & Miller LLP  
PO Box 2564  
Boise ID 83702  
[joe@mcdevitt-miller.com](mailto:joe@mcdevitt-miller.com)

Hand Delivery  
 U.S. Mail, postage pre-paid  
 Facsimile  
 Electronic Mail

Daniel E Solander  
Rocky Mountain Power  
201 South Main Street Ste 2400  
Salt Lake City UT 84111  
[daniel.solander@pacificorp.com](mailto:daniel.solander@pacificorp.com)  
[datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)

Hand Delivery  
 U.S. Mail, postage pre-paid  
 Facsimile  
 Electronic Mail

Ted Weston  
Rocky Mountain Power  
201 South Main Ste 2300  
Salt Lake City UT 84111  
[ted.weston@pacificorp.com](mailto:ted.weston@pacificorp.com)


Hand Delivery  
 U.S. Mail, postage pre-paid  
 Facsimile  
 Electronic Mail

Kelsey Jae Nunez  
Snake River Alliance  
PO Box 1731  
Boise ID 83701  
[knunez@snakeriveralliance.org](mailto:knunez@snakeriveralliance.org)

Hand Delivery  
 U.S. Mail, postage pre-paid  
 Facsimile  
 Electronic Mail

Donovan E. Walker  
Lisa A. Grow  
RandyAllphin  
Idaho Power Company  
1221 West Idaho Street  
Boise, ID 83702  
[dwalker@idahopower.com](mailto:dwalker@idahopower.com)  
[lgrow@idahopower.com](mailto:lgrow@idahopower.com)  
[rallphin@idahopower.com](mailto:rallphin@idahopower.com)  
[dockets@idahopower.com](mailto:dockets@idahopower.com)

Hand Delivery  
 U.S. Mail, postage pre-paid  
 Facsimile  
 Electronic Mail

Signed   
Nina M. Curtis