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 IDAHO PUBLIC
 UTILITIES COMMISSION

Attorneys for Ecoplexus, Inc.

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER) Case No. IPC-E-15-01
COMPANY’S PETITION TO MODIFY)
TERMS AND CONDITIONS OF) PETITION TO INTERVENE OF
PROSPECTIVE PURPA ENERGY) ECOPLEXUS, INC.
SALES AGREEMENTS)
)
)
)

COMES NOW Ecoplexus, Inc., a Delaware corporation (“Ecoplexus”) and petitions to intervene in the above matter pursuant to the Commission's Rules of Practice and Procedure, IDAPA 31.01.01.071-.75. As discussed below, Ecoplexus has a direct and substantial interest in these proceedings, and therefore the Commission should grant intervention.

PETITION TO INTERVENE

I.

Ecoplexus is a leader in the development, design, engineering, construction and financing of solar energy systems for nonprofit, commercial, municipal, and utility markets.

Ecoplexus has requested pricing and energy service agreements from Idaho Power Company and Rocky Mountain Power in 2014 and 2015 for several proposed, qualifying facility,

solar generating projects located in Elmore, Minidoka, Caribou and Bonneville Counties, State of Idaho. More specifically, Ecoplexus has proposed projects totaling 160 MW in Idaho Power Company service territory and 280 MW in Rocky Mountain Power service territory.

II.

Ecoplexus requests that all pleadings, correspondence, discovery, and other documents be served on the following:

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III.

This Petition to Intervene is not timely pursuant to Order No. 33222. However, Ecoplexus was not aware of this proceeding until recently. Ecoplexus's participation will not broaden the issues, delay the proceedings or result in prejudice to any party.

IV.

Ecoplexus 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 Ecoplexus will introduce is dependent upon the nature and effect of other evidence in this proceeding.

For example, Ecoplexus wishes to participate in this proceeding to address whether the relief requested in Idaho Power Company's Application should also be granted to Rocky Mountain Power. Ecoplexus contends that Rocky Mountain Power's resource needs and current

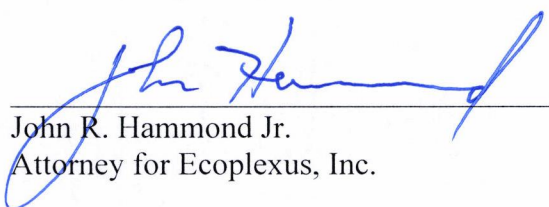
number of requests from qualifying facilities are different than Idaho Power Company's.

Accordingly, Ecoplexus believes that any relief granted by the Commission in this case should be narrowly tailored to each utility's specific circumstances. Additionally, Ecoplexus wishes to address whether proposed projects that had pricing and energy service agreements with Idaho Power Company, Avista and Rocky Mountain Power prior to the Commission's Order for Temporary Relief, Order No. 33222, should be treated differently, i.e., grandfathered into previous terms and conditions, than those that seek pricing and energy service agreements after such Order.

Without the opportunity to intervene herein, Ecoplexus would be without a manner or means of participating in the lawful determination of issues which may affect the avoided cost rates or contract terms and conditions regarding Ecoplexus's present or future energy service agreements with regulated utilities in the state of Idaho. Specifically, any decision in this case will directly impact Ecoplexus's proposed projects in Idaho Power Company's service territory and those in Rocky Mountain Power's service territory as cited in its Petition at pages 4-5, in Case No. PAC-E-15-3.

WHEREFORE, Ecoplexus 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 12th day of May 2015



John R. Hammond Jr.
Attorney for Ecoplexus, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the ____ day of May, 2015, I served a true and correct copy of the foregoing by delivering the same to each of the following individuals by electronic mail, addressed as follows:

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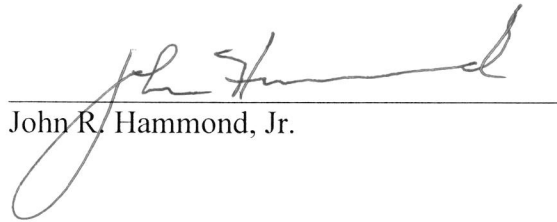
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