Eric L. Olsen (ISB#: 4811) RACINE, OLSON, NYE, BUDGE & BAILEY, CHARTERED P.O. Box 1391 Pocatello, Idaho 83204-1391 Telephone: (208)232-6101 Fax: (208)232-6109 Email: <u>elo@racinelaw.com</u> RECEIVED 2015 FEB 18 PM 12: 24 IDAMO PUBLIC UTILITIES COMMISSION

Attorneys for Intervenor Idaho Irrigation Pumpers Association, Inc.

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 OF IDAHO IRRIGATION PUMPERS ASSOCIATION, INC. FOR LEAVE TO INTERVENE

COMES NOW Idaho Irrigation Pumpers Association, Inc., herein called "this Intervenor"

and pursuant to Rules 71 through 73 of the rules of Procedure of the Idaho Public Utility

Commission, and by this Petition asks leave to intervene herein and to appear and participate as a

party herein, and as basis therefor states as follows:

(1) The name and address of this Intervenor is:

Idaho Irrigation Pumpers Association, Inc. c/o Lynn Tominaga P.O. Box 2624 Boise, Idaho 83701-2624

This Intervenor will be represented by:

Eric L. Olsen Racine, Olson, Nye, Budge & Bailey, Chartered P.O. Box 1391; 201 E. Center Pocatello, Idaho 83204-1391 and requests that copies of all pleadings and production requests and responses should be provided to the following:

Eric L. Olsen Racine, Olson, Nye, Budge & Bailey, Chartered P.O. Box 1391; 201 E. Center Pocatello, Idaho 83204-1391 Telephone: (208) 232-6101 Fax: (208) 232-6109 E-mail: <u>elo@racinelaw.net</u>

Anthony Yankel 29814 Lake Road Bay Village, Ohio 44140 Fax: 440-808-1450 E-mail: tony@yankel.net

(2) This Intervenor and its members have a direct and substantial interest in this proceeding and intend to participate in all respects herein as a party as may be required to represent its interests.

(3) Without the opportunity to intervene herein, this Intervenor would be without a manner or means of participating in the lawful determination of issues which will result in affecting its rates for electric service.

WHEREFORE, this Intervenor requests that this Commission confirm this Intervenor's leave to intervene in these proceedings and to appear and participate in all matters as may be necessary and appropriate; that the Commission order that a hearing be scheduled on this matter; and to allow this Intervenor to present evidence, call and examine witnesses, cross-examine witnesses, present argument, and to allow otherwise fully participate in the proceedings.

DATED this $\frac{8}{8}$ day of February, 2015.

RACINE, OLSON, NYE, BUDGE & BAILEY, CHARTER

By: <u>lopran ciken for</u> ERIC L. OLSEN

PETITION OF IDAHO IRRIGATION PUMPERS ASSOCIATION, INC. FOR LEAVE TO INTERVENE- Page 3

CERTIFICATE OF SERVICE

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I HEREBY CERTIFY that on this $\cancel{12}$ day of February, 2015 I served a true, correct and complete copy of the Petition of Idaho Irrigation Pumpers Association, Inc. for Leave to Intervene to each of the following, via U.S. Mail or private courier, e-mail or hand delivery, as indicated below:

Jean D. Jewell, Secretary Idaho Public Utilities Commission P.O. Box 83720 472 W. Washington Street Boise, Idaho 83720-0074 jjewell@puc.state.id.us	 X	U.S. Mail/Postage Prepaid E-mail Facsimile Overnight Mail Hand Delivered
Donovan E. Walker Regulatory Dockets Idaho Power Company P.O. Box 70 Boise, ID 83707 <u>dwalker@idahopower.com</u> <u>dockets@idahopower.com</u>	 	U.S. Mail/Postage Prepaid E-mail Facsimile Overnight Mail Hand Delivered
Peter J. Richardson Gregory M. Adams RICHARDSON ADAMS, LLP 515 n 7 TH Street P.O. Box 7218 Boise, ID 83702 <u>peter@richardsonadams.com</u> <u>greg@richardsonadams.com</u>		U.S. Mail/Postage Prepaid E-mail Facsimile Overnight Mail Hand Delivered
Dr. Don Reading 6070 Hill Road Boise, ID 83703 <u>dreading@mindspring.com</u>	<u> </u>	U.S. Mail/Postage Prepaid E-mail Facsimile Overnight Mail Hand Delivered
Benjamin J. Otto Idaho Conservation League 710 N. 6 th Street Boise, ID 83702 <u>botto@idahoconservationleague.org</u>	X	U.S. Mail/Postage Prepaid E-mail Facsimile Overnight Mail Hand Delivered

PETITION OF IDAHO IRRIGATION PUMPERS ASSOCIATION, INC. FOR LEAVE TO INTERVENE- Page 4

Dean J. Miller McDevitt & Miller LLP 420 W. Bannock Street P.O. Box 2564-83701 Boise, ID 83702 joe@mcdevitt-miller.com		U.S. Mail/Postage Prepaid E-mail Facsimile Overnight Mail Hand Delivered
Leif Elgethun, PE, LEED AP Intermountain Energy Partners, LLC P.O. Box 7354 Boise, ID 83707 <u>leif@sitbasedenergy.com</u>		U.S. Mail/Postage Prepaid E-mail Facsimile Overnight Mail Hand Delivered
Kelsey Jae Nunez Snake River Alliance 223 N. 6 th Street, Suite 317 P.O. Box 1731 Boise, ID 83701 knunez@snakeriveralliance.org	<u> </u>	U.S. Mail/Postage Prepaid E-mail Facsimile Overnight Mail Hand Delivered

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