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IDAHO PUBLIC  
UTILITIES COMMISSION

Attorneys for the J. R. Simplot Company

BEFORE THE  
IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE COMMISSION'S	)	
REVIEW OF PURPA QF CONTRACT	)	CASE NO. IPC-E-13-18
PROVISIONS INCLUDING THE	)	
SUBROGATE AVOIDED RESOURCE	)	PETITION TO INTERVENE
(SAR) AND INTEGRATED RESOURCE	)	OF THE J. R. SIMPLOT COMPANY
PLANNING (IRP) METHODOLOGIES FOR	)	
CALCULATING AVOIDED COST RATES.	)	

COMES NOW, The J. R. Simplot Company, hereinafter referred to as "Intervenor," and pursuant to this Commission's Rule of Procedure, Rule 071, IDAPA 31.10.01074, 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:

J. R. Simplot Company  
c/o Peter J. Richardson  
Richardson Adams, PLLC  
515 N. 27<sup>th</sup> Street  
Boise, Idaho 83702  
Telephone: (208) 938-7900  
Fax: (208) 938-7904

2. This Intervenor will be represented herein by:

Peter J. Richardson (ISB No. 3195)  
Gregory M. Adams (ISB No. 7454)  
Richardson Adams, PLLC  
515 N. 27<sup>th</sup> Street  
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[greg@richardsonadams.com](mailto:greg@richardsonadams.com)

3. Copies of all pleadings, production requests, production responses, Commission orders and other documents should be provided to Peter J. Richardson as noted above and to:

Dr. Don Reading  
6070 Hill Road  
Boise, Idaho 83703  
(208) 342-1700  
[dreading@mindspring.com](mailto:dreading@mindspring.com)

4. This Intervenor, the J. R. Simplot Company is a corporation duly qualified to do business in the State of Idaho. The J. R. Simplot Company currently has a cogeneration facility at its operations in Pocatello, Idaho. It has a PURPA contract providing for Idaho Power to purchase the output of that plant. That contract that is due to expire in 2015. The J.R. Simplot Company plans to obtain a new PURPA contract with Idaho Power for that Pocatello cogeneration facility in the near future. In addition, the Company is pursuing other energy projects on its property in Idaho with the goal of obtaining PURPA contracts with Idaho Power and possibly other utilities. The J.R. Simplot Company therefore claims a direct and substantial interest in this proceeding because its ability to make such sales will be affected by the outcome of this proceeding.

5. 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.

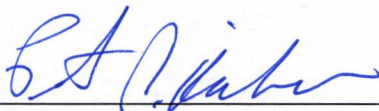
6. Without the opportunity to intervene herein, this Intervenor would be without any means of participation in this proceeding which may have a material impact on its ability to enter into PURPA contracts in the State of Idaho.

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

**WHEREFORE**, the J. R. Simplot 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.

DATED this 6th day of November, 2013.

RICHARDSON ADAMS, PLLC

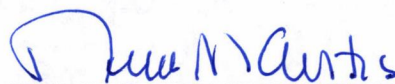
By   
Peter J. Richardson  
Of Attorneys for the J.R. Simplot Co.

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 6th day of November, 2013, a true and correct copy of the within and foregoing PETITION TO INTERVENE BY THE J. R. SIMPLOT COMPANY , Case No. IPC-E-13-18, was served by electronic mail and U.S. Mail, postage prepaid, to:

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

Donovan Walker  
Idaho Power Company  
1221 West Idaho Street (83702)  
PO Box 70  
Boise, Idaho 83707-0070  
E-mail: [dwalker@idahopower.com](mailto:dwalker@idahopower.com)



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Nina Curtis  
Legal Assistant