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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)
SU RROGATE AVOI DED 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. 27th 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
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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

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.