

Brad M. Purdy
 Attorney at Law
 Bar No. 3472
 2019 N. 17th St.
 Boise, ID. 83702
 (208) 384-1299 (Land)
 (208) 384-8511 (Fax)
bmpurdy@hotmail.com
 Attorney for Petitioner
 Community Action Partnership
 Association of Idaho

RECEIVED
 2011 JUN 20 AM 10:40
 IDAHO PUBLIC
 UTILITIES COMMISSION

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION)	
OF PACIFICORP DBA ROCKY MOUNTAIN)	CASE NO. PAC-E-11-12
POWER FOR APPROVAL OF CHANGES TO)	
ITS ELECTRIC SERVICE SCHEDULES)	COMMUNITY ACTION
)	PARTNERSHIP ASSOCIA-
)	TION'S PETITION TO
)	INTERVENE
)	

COMES NOW, Community Action Partnership Association of Idaho (hereinafter "CAPAI" or "Intervenor") and, pursuant to Rules 071-075 of the Commission's Rules of Practice and Procedure, IDAPA 31.01.01.071-075, hereby petitions the Commission for leave to intervene in this proceeding and to appear and participate with full party's rights. In support of this Petition, CAPAI states as follows:

1. The address and name of the Petitioner is:

Community Action Partnership Association of Idaho
 5400 W. Franklin Rd., Suite G
 Boise, ID. 83705

2. CAPAI will be represented in this proceeding by, and pleadings and other correspondence need only be sent to:

Brad M. Purdy
 Attorney at Law

2019 N. 17th St.
Boise, ID. 83702
208-384-1299
FAX: 208-384-8511
Email: bmpurdy@hotmail.com

3. CAPAI is a non-profit corporation consisting of six community action agencies serving every county in Idaho and also includes, among others, the statewide Community Council of Idaho and fights the causes and conditions of poverty through building the capacity and effectiveness of its members who have a direct and substantial interest in this proceeding. These causes and conditions of poverty include increasing utility rates for Rocky Mountain Power's low income rate payers.

Low income families pay a higher percentage of their income for utility expenses than those in other economic categories. CAPAI is often the only party who intervenes in proceedings before the Commission specifically representing public utilities' low-income customers. In particular, CAPAI has been involved in the vast majority of PacifiCorp cases in recent years and works with the utility on a regular basis for many reasons such as implementation and auditing of the Company's low-income weatherization program and other matters. If granted intervention in this case, CAPAI will address a variety of issues of importance to the general body of ratepayers.

CAPAI believes that it would fulfill an important role in this proceeding if given the opportunity to participate as a party. Consequently, it is fair to say that CAPAI has a direct and substantial interest in the subject matter of this proceeding and its intervention will not unduly broaden the issues presented by Rocky Mountain Power's Application.

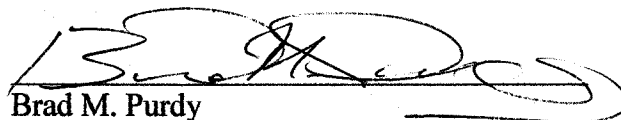
Finally, the Commission itself indicated an expectation that CAPAI would be involved in this proceeding to address, at the least, an as of yet unresolved issue first raised in Rocky

Mountain's last general rate proceeding (Case No. PAC-E-10-07). Regarding whether RMP's Low-Income Conservation Education Program is an ongoing program, the Commission ruled in Order No. 3224 issued April 18, 2011: "We find that it is both reasonable and appropriate to revisit this issue in the Company's next general rate case." *Id. at p. 5.* Noting that Rocky Mountain had already filed a notice of intent to file a new general rate case in the near future, the Commission concluded: "Without reaching the merits of the issue, we generally believe that education programs addressing energy conservation provide valuable information to low-income ratepayers. We foresee that this issue will receive careful attention from CAPAI, Rocky Mountain and Staff and will be fully resolved in the next general rate proceeding." *Id.*

4. CAPAI respectfully requests the right to participate in this proceeding and introduce testimony and exhibits, cross-examine other witnesses, engage in oral argument, file comments, and otherwise fully participate as a party.

WHEREFORE, the Community Action Partnership Association of Idaho hereby requests that this Commission grant its Petition to Intervene in this proceeding and to fully appear and participate as a party with all the rights and responsibilities as such.

DATED, this 20th day of June, 2011.


Brad M. Purdy

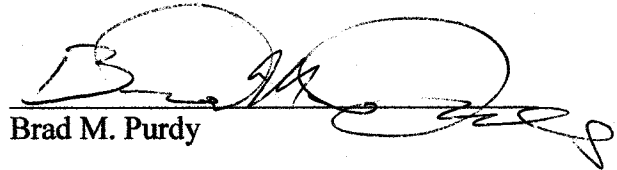
CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on the 20th day of June, 2011, I served a copy of the foregoing document on the following by electronic mail.

Ted Weston
Rocky Mountain Power
201 South Main, Suite 2300
Salt Lake City, UT 84111
ted.weston@pacificorp.com

Daniel E. Solander
Rocky Mountain Power
201 South Main, Suite 2300
Salt Lake City, UT 84111
daniel.solander@pacificorp.com

DATED, this 20th day of June, 2011


Brad M. Purdy