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Attorneys for the  
Oregon Industrial Customers of Idaho Power

BEFORE THE  
PUBLIC UTILITY COMMISSION OF OREGON

|                                      |   |                              |
|--------------------------------------|---|------------------------------|
| In the Matter of IDAHO POWER COMPANY | ) |                              |
| Request for General Rate Revision    | ) | UE 233                       |
|                                      | ) |                              |
|                                      | ) | PETITION TO INTERVENE OUT OF |
|                                      | ) | TIME AND WAIVER OF PAPER     |
|                                      | ) | SERVICE                      |

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The Oregon Industrial Customers of Idaho Power hereby petitions the Public Utility Commission of Oregon (“Commission”), pursuant to ORS § 756.525 and OAR 860-001-0300, for leave to intervene out of time 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:

Oregon Industrial Customers of Idaho Power  
c/o Peter J. Richardson  
Richardson & O'Leary  
515 N. 27<sup>th</sup> St  
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Copies of all pleadings, production requests, production responses, Commission orders and other documents should be provided to:

Peter J. Richardson (OSB No. 06668) **(W)**  
Gregory M. Adams (OSB No. 101779) **(W)**  
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2. This Intervenor, the Oregon Industrial Customers of Idaho Power, ("OICIP") is an unincorporated association of Schedule 19 customers of Idaho Power Company in Oregon. The OICIP's membership includes two Schedule 19 customers at this time. The purpose of the

OICIP is to ensure its members receive high electricity service quality and cost-of-service electricity rates.

3. OICIP members receive electric utility services from Idaho Power Company, and OICIP intends to raise issues related to Idaho Power Company's requested rate increase in UE 233, which will affect its members.

4. OICIP claims a direct and substantial interest in this proceeding because the outcome will affect this Intervenor's members' electricity rates for service from Idaho Power Company.

5. This Intervenor, in its capacity as a representative of industrial customers intends to participate herein as a party, and if necessary, to introduce evidence, submit comments, and fully participate in any hearing that may occur including the calling and cross examination of witnesses. 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 effective means of participation in this proceeding which may have a material impact on its electric rates and terms and conditions of service.

7. This Intervenor acknowledges that this Petition to Intervene is filed out of time to the extent that it is filed after the deadline for filing petitions to intervene set in procedural order entered in this case on August 23, 2011. However, the Intervenor requests leave to intervene out of time on the grounds that O.R.S. § 756.525 permits intervention in Commission proceedings at any time prior to close of the record, and that granting this Intervenor's petition to intervene at this time will not unduly broaden the issues or prejudice any party to this case.

8. This Intervenor, OICIP, hereby waives paper service in these proceedings.

**WHEREFORE**, the Oregon Industrial Customers of Idaho Power 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 at any hearing that may occur, and to otherwise fully participate in these proceedings.

DATED this 28<sup>th</sup> day of September 2011.

RICHARDSON & O'LEARY, PLLC



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Gregory M. Adams  
OSB No. 101779  
Attorneys for the Oregon  
Industrial Customers of Idaho Power

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 28<sup>th</sup> day of September, 2011, a true and correct copy of the within and foregoing **PETITION TO INTERVENE OF THE OREGON INDUSTRIAL CUSTOMERS OF IDAHO POWER** was served as follows:

CHRISTA BEARRY  
LISA D NORDSTROM  
**IDAHO POWER COMPANY**  
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☐ Hand Delivery  
☐ U.S. Mail, postage pre-paid  
☐ Facsimile  
☒ Electronic Mail

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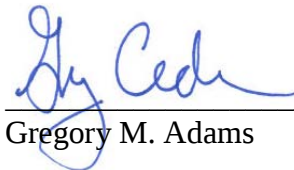
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Signed

  
\_\_\_\_\_  
Gregory M. Adams