

BEFORE THE
PUBLIC UTILITY COMMISSION OF OREGON

In the Matter of

IDAHO POWER COMPANY

**General Rate Revision Application for
Authority to include the Langley Gulch
Power Plant Investment in Rate Base.**

)
) UE 248
)
) NORTHWEST AND
) INTERMOUNTAIN POWER
) PRODUCERS COALITION'S
) PETITION TO INTERVENE
)

The Northwest and Intermountain Power Producers Coalition (“NIPPC” or “Intervenor”) hereby petitions the Public Utility Commission of Oregon (“Commission”), pursuant to ORS § 756.525 and OAR 860-001-0300, 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:

Northwest and Intermountain Power Producers Coalition
c/o Robert D. Kahn, Executive Director (**waives paper service**)
1117 Minor Avenue, Suite 300
Seattle, Washington 98101
Telephone: 206-236-7200
Fax: 206-624-1235
rkahn@nippc.org

2. This Intervenor will be represented herein by:

Peter J. Richardson (OSB No. 06668) (**waives paper service**)
Gregory M. Adams (OSB No. 101779) (**waives paper service**)
Richardson & O’Leary PLLC
515 N. 27th Street
P.O. Box 7218
Boise, Idaho 83702
Telephone: 208-938-2236
Fax: 208-938-7904
peter@richardsonandoleary.com
greg@richardsonandoleary.com

3. NIPPC is a trade association whose members and associate members include independent power producers active in the Pacific Northwest and Western energy markets. Pursuant to OAR 860-001-0300 (c), NIPPC submits that there are currently fifteen (15) companies or firms that are full members of NIPPC, and seven (7) companies or firms that are associate members of NIPPC. The purpose of NIPPC is to represent the interests of its members in developing rules and policies that help achieve a competitive electric power supply market in the Pacific Northwest, and to monitor competitive solicitations for compliance with existing rules and policies.

4. NIPPC has a substantial interest in this docket. NIPPC's members desire to advance competitive resource procurement policies in Oregon in the belief that such policies provide cost savings and other benefits for Oregon's economy and its electricity consumers. Toward that end, NIPPC has previously and actively participated in Docket Nos. UM 1066, UM 1182, LC 33, UM 1208, UM 1276, UM 1374, UM 1429, UM 1499, LC 48, UM 1535. Specific to Idaho Power's Langley Gulch plant, NIPPC intervened in Docket No. UM 1378 wherein Idaho Power initially sought a waiver of Oregon's competitive bidding guidelines. NIPPC also was a party to and participated in the proceeding before the Idaho Public Utilities Commission (Case No. IPC-E-09-03) regarding the Certificate for Public Convenience and Necessity for the Langley Gulch plant. NIPPC's interest in this docket is in protecting the integrity of Oregon's competitive bidding guidelines, and NIPPC's interest will not be represented by any other party.

5. Without the opportunity to intervene herein, NIPPC would be without adequate means of participation in this proceeding which may have a material impact on its members' business activities in the State of Oregon.

6. Granting NIPPC's petition to intervene will not unduly broaden the issues nor will

it prejudice any party to this case.

7. For all the reasons stated herein, NIPPC asks that its Petition to Intervene be granted.

8. NIPPC requests that Peter J. Richardson, Gregory M. Adams, and Robert D. Kahn be placed on the official service list for this docket. NIPPC waives paper service.

RESPECTFULLY SUBMITTED this 29th day of March, 2012.

RICHARDSON & O'LEARY PLLC

/s/ Gregory M. Adams

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Attorneys for Northwest and Intermountain
Power Producers Coalition

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 29th day of March, 2011, a true and correct copy of the within and foregoing **Northwest and Intermountain Power Producers Coalition’s Petition to Intervene** was served as shown to:

STEVE SCHUE
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By: /s/ Gregory M. Adams
Gregory M. Adams