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IDAHO PUBLIC UTILITIES COMMISSION

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Authorized Representative of Atlanta Electrical Consumer Co-op, Inc., *Pro Se*

BEFORE THE

IDAHO PUBLIC UTILITIES COMMISSION

MARY DRAKE,

Complainant,

vs.

ATLANTA POWER COMPANY,

Respondent.

Case No. ATL-E-18-01

**PETITION TO INTERVENE OF
ATLANTA ELECTRICAL
CONSUMER CO-OP, INC.**

COMES NOW, the Atlanta Electrical Consumer Co-op, Inc. ("Co-op"), hereinafter referred to "Intervenors," and pursuant to this Commission's Rules of Procedure, Rule 71 IDAPA 31.01.01.71 hereby petition 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 Intervenors are:

Atlanta Electrical Consumer Co-op, Inc.
c/o Steven J. Meade
225 N. 9th Street, Suite 820
P.O. Box 1097
Boise, ID 83701
Telephone (208)331-1170
Facsimile (208)331-1529
smeade@idalaw.com

Copies of all pleadings, production requests, production responses, Commission orders and other documents should be provided to Steven J. Meade as noted above, with an electronic copy to:

Board Members of the Co-op:

PDFD247@Yahoo.com
joyonemartinez@gmail.com
gregoryhahn@gmail.com
jgilles@cableone.net

2. The Intervenor is a group of community members that have an interest in acquiring Atlanta Power Company, Inc. (hereinafter "APC"). Moreover, Co-op membership consists of landowners in Atlanta, Idaho that receive electric power from Atlanta Power, Inc.

3. On July 9, 2018, the Co-op developed articles of incorporation for a non-profit corporation and filed the same with the Idaho Secretary of State. The Co-op has developed and adopted bylaws, customer service rules, service requirements and a membership application.

4. The Co-op has obtained an EIN from the Internal Revenue Service and is in process of being recognized by the Internal Revenue Service as a 501(c) exempt organization.

5. Funding has been researched and is available through USDA Rural to purchase APC.

6. The Intervenors intend to participate herein as parties, 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 the Intervenors will introduce is dependent upon the nature and effect of other evidence in this proceeding.


7. Without the opportunity to intervene herein, the Intervenors would be without any means of participation in this proceeding which may have material impact on electric rates and the terms and conditions of such service, and the future ownership of APC.

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

9. As Intervenor for the Atlanta Landowner's Association and Atlanta Water Association, Inc., I acknowledge service of this document.

WHEREFORE, the Co-op respectfully requests this Commission grant their 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 15 day of May, 2019.



STEVEN J. MEADE

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 15 day of May, 2019, a true and correct copy of the above and foregoing document was forwarded addressed as follows in the manner stated below:

Diane Hanian (H, E)
Commission Secretary
Idaho Public Utilities Commission
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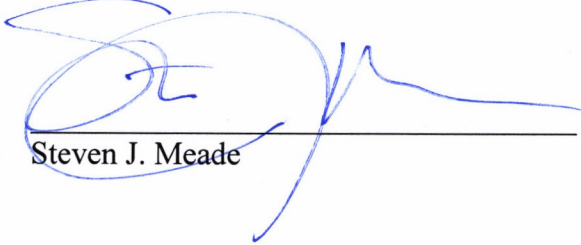
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Steven J. Meade