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IDAHO PUBLIC UTILITIES COMMISSION

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Attorneys for IdaHydro

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF COMMISSION
STAFF’S APPLICATION TO UPDATE
INPUTS TO THE “SURROGATE
AVOIDED RESOURCE” METHOD
AVOIDED COST RATES

) Case No. GNR-E-22-01
)
) **IDAHYDRO’S PETITION TO**
) **INTERVENE**
)
)

COMES NOW the Idaho Hydroelectric Power Producers Trust, an Idaho Trust, d/b/a IdaHydro (“IdaHydro”), by and through its counsel of record, C. Tom Arkoosh and Amber Dresslar of Arkoosh Law Offices, and pursuant to the Idaho Public Utilities Commission Rules of Procedure, IDAPA 31.01.01.071-073, 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 the intervenor is:
IdaHydro
c/o C. Tom Arkoosh and Amber Dresslar
Arkoosh Law Offices
913 W. River Street, Suite 450
P.O. Box 2900
Boise, ID 83701
Telephone: (208) 343-5105
Facsimile: (208) 343-5456
Email: tom.arkoosh@arkoosh.com
Email: amber.dresslar@arkoosh.com
With an email copy to: erin.cecil@arkoosh.com

Copies of all pleadings, production requests, production responses, Commission orders

and other documents should be provided as noted above.

2. This Intervenor, IdaHydro is a confederacy of Idaho small hydroelectric producers joined in a trust for mutual benefit, consisting of approximately 90 MW of capacity produced by 33 small hydroelectric plants. All its members currently sell electric power and energy to Idaho Power pursuant to multiple contracts and have the potential to sell additional electric power and energy at other possible cogeneration and small power production locations in Idaho. IdaHydro members all have Surrogate Avoided Resource pricing and Schedule 72 operation and maintenance. Therefore, IdaHydro claims a direct and substantial interest in this proceeding in that the prices it receives for electrical sales and costs it pays to Idaho Power may be affected by the outcome of this proceeding.

3. IdaHydro intends to participate herein as a party 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 this Intervenor will introduce is dependent upon the nature and effect of other evidence in this proceeding.

4. Without the opportunity to intervene herein, this Intervenor would be without any means of participation in this proceeding, which may have a material impact on the prices it receives for electric sales and costs it pays to Idaho Power.

WHEREFORE, IdaHydro 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 fully participate in these proceedings.

DATED this 2nd day of May 2022.

ARKOOSH LAW OFFICES



C. Tom Arkoosh
Attorney for IdaHydro

CERTIFICATE OF MAILING

I HEREBY CERTIFY that on the 2nd day of May 2022, I served a true and correct copy of the foregoing document(s) upon the following person(s), in the manner indicated:

Commission Secretary	_____	U.S. Mail, Postage Prepaid
Idaho Public Utilities Commission	_____	Overnight Courier
11331 W. Chinden Blvd., Building 8,	_____	Hand Delivered
Suite 201-A	_____	Via Facsimile
P.O. Box 83720	<u> X </u>	E-mail:
Boise, ID 83720-0074		secretary@puc.idaho.gov

Dayn Hardie	_____	U.S. Mail, Postage Prepaid
Deputy Attorney General	_____	Overnight Courier
P.O. Box 83720	_____	Hand Delivered
Boise, ID 83702-0074	_____	Via Facsimile
	<u> X </u>	E-mail:
		dayn.hardie@puc.idaho.gov

Mike Louis	_____	U.S. Mail, Postage Prepaid
Idaho Public Utilities Commission	_____	Overnight Courier
P.O. Box 83720	_____	Hand Delivered
Boise, ID 83702-0074	_____	Via Facsimile
	<u> X </u>	E-mail:
		mike.louis@puc.idaho.gov



C. Tom Arkoosh