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February 10, 2015

Jean Jewell, Commission Secretary Idaho Public Utilities Commission 472 West Washington Street Boise, Idaho 83702

Re: Corrected Cover Page – ICIP Petition to Intervene IPC-15-03

Dear Ms. Jewell:

Enclosed you will find an original and seven copies of replacement page one of the Petition to Intervene filed yesterday by the Industrial Customers of Idaho Power in the above referenced matter. Would you please substitute the enclosed for the page one that was filed yesterday as it contains an incorrect address for our law firm. Thank you for your attention to this matter.

Very truly yours,

-) Nuto

Peter J. Richardson Richardson Adams, PLLC

Cc: Lisa Nordstrom Tami White Quentin Nesbitt Idaho Power Company 1221 West Idaho Street Boise, Idaho 83702 Peter J. Richardson (ISB No. 3195) Greg Adams (ISB 7454) Richardson Adams, PLLC 515 N. 27th Street P.O. Box 7218 Boise, Idaho 83702 Telephone: (208) 938-7901 Fax: (208) 938-7904 peter@richardsonadams.com

Attorneys for the Industrial Customers of Idaho Power

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER COMPANY'S APPLICATION FOR APPROVAL OF NEW TARIFF SCHEDULE 82, A COMMERCIAL AND INDUSTRIAL DEMAND RESPONSE PROGRAM (FLEX PEAK PROGRAM).

CASE NO. IPC-E-15-03

PETITION TO INTERVENE OF THE INDUSTRIAL CUSTOMERS OF IDAHO POWER

COMES NOW, The Industrial Customers of Idaho Power, hereinafter referred to as

"Intervenor," and pursuant to this Commission's Rules of Procedure, Rule 71 IDAPA

31.01.01.71 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 this Intervenor is:

Industrial Customers of Idaho Power c/o Peter J. Richardson Richardson Adams, PLLC 515 N. 27th St P.O. Box 7218 Boise, Idaho 83702 Telephone: (208) 938-7901 Fax: (208) 938-7904 peter@richardsonadams.com Copies of all pleadings, production requests, production responses, Commission orders and other documents should be provided to Peter J. Richardson as noted above and to:

> Dr. Don Reading 6070 Hill Road Boise, Idaho 83703 (208) 342-1700 Tel (208) 384-1511 Fax dreading@mindspring.com

2. This Intervenor, the Industrial Customers of Idaho Power, ("ICIP") is an unincorporated association of Schedule 19 customers of Idaho Power. All ICIP members receive electric utility services from Idaho Power Company. The ICIP claims a direct and substantial interest in this proceeding in that the outcome will affect its members' participation in the demand reduction program designed for industrial customer use.

3. 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.

5. 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 members' participation in demand reduction programs offered by Idaho Power.

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

WHEREFORE, the 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 9th day of February 2015.

Richardson Adams, PLLC

By

Peter J. Richardson Industrial Customers of Idaho Power

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 9th day of February, 2015, a true and correct copy of the within and foregoing PETITION TO INTERVENE BY THE INDUSTRIAL CUSTOMERS OF IDAHO POWER, in Docket No. IPC-E-15-03 was served as indicated below to:

Ms. Jean Jewell

Commission Secretary Idaho Public Utilities Commission P O Box 83720 Boise ID 83720-0074 <u>X</u> Hand Delivery
U.S. Mail, postage pre-paid
Facsimile
Electronic Mail

X Hand Delivery

Electronic Mail

____ Facsimile

Lisa D. Nordstrom Idaho Power Company 1221 West Idaho Street Boise, Idaho 83707-0070 Inordstrom@idahopower.com dockets@idahopower.com

Tami White Quentin Nesbitt Idaho Power Company 1221 West Idaho Street Boise, Idaho 83702 twhite@idahopower.com gnessbitt@idahopower.com Hand Deliver

____ U.S. Mail, postage pre-paid

<u>X</u>U.S. Mail, postage pre-paid Facsimile <u>X</u>Electronic Mail

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Nina Curtis Administrative Assistant