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Attorneys for Idaho Clean Energy Association

## BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

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IN THE MATTER OF IDAHO POWER	)
COMPANY'S APPLICATION FOR	) Case No. IPC-E-17-13
AUTHORITY TO ESTABLISH NEW	)
SCHEDULES FOR RESIDENTIAL AND	) IDAHO CLEAN ENERGY
SMALL GENERAL SERVICE	) ASSOCIATION'S PETITION TO
CUSTOMERS WITH ON-SITE	) INTERVENE
GENERATION	)
	)
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COMES NOW the Idaho Clean Energy Association, by and through its counsel of record, C. Tom Arkoosh of Arkoosh Law Offices and David H. Arkoosh of Law Office of David Arkoosh, 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 the intervenor is:

Idaho Clean Energy Association PO Box 2264 Boise, Idaho 83701

2. Copies of all pleadings, production requests, production responses, Commission

IDAHO CLEAN ENERGY ASSOCIATION'S PETITION TO INTERVENE – Page 1

orders and other documents should be provided as follows:

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Boise, ID 83701

Email: tom.arkoosh@arkoosh.com

With an email copy to: erin.cecil@arkoosh.com

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3. This Intervenor, Idaho Clean Energy Association, is a nonprofit organization

dedicated to the advancement of renewable energy, energy efficiency and their associated

technologies in the State of Idaho. Its members currently sell products that are subject to the

schedules at issue in this matter. Therefore, Idaho Clean Energy Association claims a direct and

substantial interest in this proceeding in that the prices its members receive for electrical sales

and costs they pay to Idaho Power may be affected by the outcome of this proceeding.

4. Idaho Clean Energy Association 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.

5. 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, Idaho Clean Energy Association 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 day of September, 2017.

ARKOOSH LAW OFFICES

C. Tom Arkoosh

Attorney for Idaho Clean Energy Association

## **CERTIFICATE OF MAILING**

I HEREBY CERTIFY that on the day of September, 2017, I served a true and correct copy of the foregoing document(s) upon the following person(s), in the manner indicated:

Original and 7 copies to: Diane Hanian Commission Secretary Idaho Public Utilities Commission 472 W. Washington Boise, ID 83702	U.S. Mail, Postage Prepaid Overnight Courier Hand Delivered Via Facsimile E-mail diane.hanian@puc.idaho.gov
Copies to: Lisa D. Nordstrom Idaho Power Company PO Box 70 Boise, ID 83707	XU.S. Mail, Postage Prepaid Overnight Courier Hand Delivered Via Facsimile E-mail lnordstrom@idahopower.com dockets@idahopower.com
Timothy E. Tatum Connie Aschenbrenner Idaho Power Company PO Box 70 Boise, ID 83707	X U.S. Mail, Postage Prepaid Overnight Courier Hand Delivered Via Facsimile X E-mail ttatum@idahopower.com caschenbrenner@idahopower.com
Matthew A. Nykiel Idaho Conservation League P.O. Box 2308 102 E. Euclid, #207 Sandpoint, ID 83864	XU.S. Mail, Postage Prepaid Overnight Courier Hand Delivered Via Facsimile XE-mail mnykiel@idahoconservation.org

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Anthony Yankel 12700 Lake Avenue, Unit 2505 Lakewood, OH 44107	X U.S. Mail, Postage Prepaid Overnight Courier Hand Delivered Via Facsimile X E-mail tony@yankel.net
Elias Bishop Auric Solar, LLC 2310 S. 1300 W. West Valley City, UT 84119	X U.S. Mail, Postage Prepaid Overnight Courier Hand Delivered Via Facsimile X E-mail elias.bishop@auricsolar.com
	C. Tom Arkoosh