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Attorneys for Intermountain Wind and Solar, LLC

## BEFORE THE IDAHO PUBIC UTILITIES COMMISSION

INTHE MATTER OF IDAHO POWER COMPANY'S APPLICATION FOR AUTHORITY TO ESTABLISH NEW SCHEDULES FOR RESIDENTIAL AND SMALL GENERAL SERVICE CUSTOMERS WITH ON-SITE GENERATION Case No. IPC-E-17-13

## PETITION TO INTERVENE OF INTERMOUNTAIN WIND AND SOLAR, LLC

Pursuant to Idaho Public Utilities Commission Rules of Procedure, IDAPA 31.01.01.071

- 073., Intermountain Wind and Solar, LLC ("Intermountain Wind and Solar") petitions the

Commission to intervene in Case No. IPC-E-17-13. In support of this petition, Petitioner states

as follows:

1. The name and contact information of this intervenor is:

Intermountain Wind and Solar, LLC 1952 West 2425 South Woods Cross, Utah 84087 Doug Shipley <u>doug@imwindandsolar.com</u> Dale Crawford <u>dale@imwindandsolar.com</u> Ryan B. Frazier (ID 6201) Brian W. Burnett (UT 3772) KIRTON McCONKIE 50 East South Temple, Suite 400 PO Box 45120 Salt Lake City, UT 84111 Telephone: 801-239-3185 <u>rfrazier@kmclaw.com</u> <u>bburnett@kmclaw.com</u>

Please provide copies of all pleadings, production requests, production responses, Commission orders, testimony, briefs, notices, and other documents as noted above.

2. On August 17, 2017, the Commission issued the "Notice of Application, Notice of Intervention Deadline Order No. 33843" and set the deadline to Petition to Intervene to be no later than twenty-one (21) days from the service date of said Order.

3. Intermountain Wind and Solar is in the business of providing solar energy services to both residential and commercial customers in Idaho who generate solar power and participate in the net metering program.

4. The outcome of Case No. IPC-E-17-13 may substantially affect Intermountain Wind and Solar's rights and interests, including the rights and interests of many of Intermountain Wind and Solar's clients.

5. The interests of justice and the orderly and prompt conduct of this proceeding will not be materially impaired by allowing Petitioner to intervene. Intermountain Wind and Solar may seek intervenor funding pursuant to IDAPA 31.01.01.161 - 165.

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WHEREFORE, Petitioner requests to intervene in this proceeding to protect its interests as they may appear.

DATED this 7th day of September 2017.

KIRTON McCONKIE

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Ryan B. Frazier Brian W. Burnett Attorneys for Intermountain Wind and Solar, LLC

## CERTIFICATE OF SERVICE

I hereby certify that on this the 7th day of September, 2017, true and correct copies of the above and foregoing PETITION TO INTERVENE OF INTERMOUNTAIN WIND AND SOLAR, LLC were sent to the following persons via the method of service noted:

FedEx:

r

Diane Hanian Commission Secretary Idaho Public Utilities Commission 472 W. Washington St. Boise, ID 83702 <u>diane.hanian@puc.idaho.gov</u> <u>diane.holt@puc.idaho.gov</u> (Original and seven copies provided)

Electronic mail:

Lisa D. Nordstrom Idaho Power Company 1221 West Idaho Street (83702) P.O. Box 70 Boise, Idaho 83707-0070 Inordstrom@idahopower.com dockets@idahopower.com

Timothy E. Tatum Connie Aschenbrenner Idaho Power Company 1221 West Idaho Street (83702) P.O. Box 70 Boise, Idaho 83707-0070 <u>ttatum@idahopower.com</u> caschenbrenner@idahopower.com

ldahydro c/o C. Tom Arkoosh Arkoosh Law Offices 802 W. Bannock Street, Suite 900 P.O. Box 2900 Boise, ID 83701 tom.arkoosh@arkoosh.com erin.cecil@arkoosh.com Matthew A. Nykiel Idaho Conservation League P.O. Box 2308 102 S. Euclid #207 Sandpoint, ID 83864 mnykiel@idahoconservation.org

Idaho Irrigation Pumpers Association, Inc. Eric L. Olsen ECHO HAWK & OLSEN, PLLC 505 Pershing Ave., Ste. 100 P.O. Box 6119 Pocatello, Idaho 83205 Email: <u>elo@echohawk.com</u>

Anthony Yankel 12100 Lake Avenue, Unit 2505 Lakewood, Ohio 44107 Email: <u>tonv@)uankel.net</u>

Dated September 7, 2017

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