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IDAHO PUBLIC

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Attorneys for the Industrial Customers of Idaho Power

BEFORE THE

IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE PETITION OF
IDAHO POWER COMPANY TO STUDY THE)
COSTS, BENEFITS, AND COMPENSATION)
OF NET EXCESS ENERGY SUPPLIED Y
CUSTOMER ON-SITE GENERATION.)
OF THE I
OF IDAH

CASE NO. IPC-E-18-15

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

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

and other documents should be provided to Peter Richardson as noted above and to:

Dr. Don Reading 6070 Hill Road Boise, Idaho 83703 (208) 342-1700 Tel (208) 383-0401 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 its members' ability to net meter electrical production may be affected by the outcome of this proceeding.
- 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, 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 their ability to net meter electrical production.
- 6. This Intervenor timely petitioned to intervene in Docket No. IPC-E-19-15 and is concurrently petitioning to intervene in Docket No. IPC-E-18-16. It has become apparent as the IPC-E-18-15 and IPC-E-18-16 cases have evolved that, in order to fully evaluate the issues and discovery responses and requests that are relevant to all three dockets, that Party status in all

three dockets will be necessary. In addition, it is the ICIP's understanding that confidential

settlement discussions may be taking place on issues that overlap all three dockets. Granting the

ICIP intervenor status out of time in this docket will not result in disruption of this proceeding,

prejudice existing parties, nor unduly broaden the issues presented in any of the dockets. The

ICIP agrees to be bound by and comply with all previously issued scheduling orders, and the

discovery process in place in this matter. Finally, Idaho Power's counsel has indicated that

Idaho Power does not object to the granting of the ICIP's petition.

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 and to otherwise fully participate in these proceedings.

DATED this 4th day of June 2019

Peter J. Richardson

RICHARDSON ADAMS, PLLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 4th day of June 2019, a true and correct copy of the within and foregoing PETITION TO INTERVENE OF THE INDUSTRIAL CUSTOMERS OF IDAHO POWER in Docket No. IPC-E-18-15 was filed at the offices of the Idaho Public Utilities Commission and served by U.S. Mail postage prepaid and electronically to:

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