

MARK A. ECHO HAWK ERIC L. OLSEN JOSEPH T. PRESTONVED ATTORNEYS

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November 6, 2018

Diane Hanian, Commission Secretary Idaho Public Utilities Commission 472 W. Washington Boise, Idaho 83720-0074 <u>diane.holt@puc.idaho.gov</u>

Re: CASE No.: IPC-E-18-15 IN THE MATTER OF IDAHO POWER COMPANY'S APPLICATION TO STUDY THE COSTS, BENEFITS, AND COMPENSATION OF NEXT EXCESS ENERGY SUPPLIED BY CUSTOMER ON-SITE GENERATION

Dear Ms. Hanian:

Enclosed you will find the original and seven (7) copies of the following:

1. Petition of Idaho Irrigation Pumpers Associations, Inc. for Leave to Intervene.

Electronic copies have been served per the Certificate of Service.

Please file the Petition in the case file. If you have any questions, please don't hesitate to call. Thank you.

Sincerely,

Eric L. Olsen

ELO/rjb Enclosures

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Eric L. Olsen (ISB# 4811) ECHO HAWK & OLSEN, PLLC 505 Pershing Ave., Ste. 100 P.O. Box 6119 Pocatello, Idaho 83205 Telephone: (208) 478-1624 Facsimile: (208) 478-1670 Email: <u>elo@echohawk.com</u> RECEIVED 2018 NOV -7 PM 1: 12 IDAHO PUBLIC UTILITIES COMMISSION

Attorney for Intervenor Idaho Irrigation Pumpers Association, Inc.

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER COMPANY'S APPLICATION TO STUDY THE COSTS, BENEFITS, AND COMPENSATION OF NET EXCESS ENERGY SUPPLIED BY CUSTOMER ON-SITE GENERATION

CASE NO. IPC-E-18-15

PETITION OF IDAHO IRRIGATION PUMPERS ASSOCIATION, INC. FOR LEAVE TO INTERVENE

COMES NOW Idaho Irrigation Pumpers Association, Inc. herein called "this Intervenor"

and pursuant to Rules 71 through 73 of the Rules of Procedure of the Idaho Public Utility

Commission, and by this Petition asks leave to intervene and to appear and participate as a party

herein, and as basis therefor states as follows:

1) The name and address of Intervenor is:

Idaho Irrigation Pumpers Association, Inc. c/o Lynn Tominga P.O. Box 2624 Boise, Idaho, 83701-2624

This Intervenor will be represented by:

Eric L. Olsen ECHO HAWK & OLSEN, PLLC 505 Pershing Ave., Ste. 100 P.O. Box 6119 Pocatello, Idaho 83205

and requests that copies of all pleadings and production requests and responses should be

PETITION OF IDAHO IRRIGATION PUMPERS ASSOCIATION, INC. FOR LEAVE TO INETERVENE– Page 1 CASE NO. IPC-E-18-15 provided to the following:

Eric L. Olsen ECHO HAWK & OLSEN, PLLC 505 Pershing Ave., Ste. 100 P.O. Box 6119 Pocatello, Idaho 83205 Telephone: (208) 478-1624 Facsimile: (208) 478-1670 Email: <u>elo@echohawk.com</u>

Anthony Yankel 12700 Lake Avenue, Unit 2505 Lakewood, Ohio 44107 Email: tony@yankel.net

2) This Intervenor and its members have a direct and substantial interest in this proceeding and intend to participate in all respects herein as a party as may be required to represent its interests.

3) Without the opportunity to intervene herein, this Intervenor would be without a manner or means of participating in the lawful determination of issues which will result in affecting its rates for electric service.

WHEREFORE, this Intervenor requests that this Commission grant this Intervenor's leave to intervene in these proceedings and to appear and participate in all matters as may be necessary and appropriate.

DATED this $\underline{5^{th}}$ day of November, 2018.

ECHO HAWK & OLSEN Who. ERIC L. OLSEN

CERTIFICATE OF SERVICE

I HEREBY CERTIFIY that on this $6^{\frac{m}{2}}$ day of November, 2018, I served a true, correct and complete copy of the Petition of Idaho Irrigation Pumpers Association, Inc. for Leave to Intervene to each of the following, via U.S. Mail or private courier, email or hand delivery, as indicated below:

Diane M. Hanian, Secretary Idaho Public Utilities Commission P.O. Box 83720 472 W. Washington Street Boise, ID 83720-0074 <u>diane.holt@puc.idaho.gov</u>	U.S. Mail Hand Delivered Overnight Mail Telecopy (Fax) Electronic Mail (Email)
Lisa D. Nordstrom Regulatory Dockets Attorney for Idaho Power Company P.O. Box 70 Boise, ID 83707 <u>Inordstrom@idahopower.com</u> <u>dockets@idahopower.com</u>	U.S. Mail Hand Delivered Overnight Mail Telecopy (Fax) Electronic Mail (Email)
Tim Tatum Idaho Power Company P.O. Box 70 Boise, ID 83707 ttatum@idahopower.com	U.S. Mail Hand Delivered Overnight Mail Telecopy (Fax) Electronic Mail (Email)
C. Tom Arkoosh Attorney for Idahydro 802 West Bannock Street, Suite 900 P.O. Box 2900 Boise, ID 83701 tom.arkoosh@arkoosh.com erin.cecil@arkoosh.com	U.S. Mail Hand Delivered Overnight Mail Telecopy (Fax) Electronic Mail (Email)
Matthew A. Nykierl Idaho Conservation League 102 South Euclid #207 P.O. Box 2308 Sandpoint, ID 83864 <u>mnykiel@idahoconservation.org</u>	U.S. Mail Hand Delivered Overnight Mail Telecopy (Fax) Electronic Mail (Email)

PETITION OF IDAHO IRRIGATION PUMPERS ASSOCIATION, INC. FOR LEAVE TO INETERVENE– Page 3 CASE NO. IPC-E-18-15 Benjamin J. Otto Idaho Conservation League 710 North 6th Street Boise, ID 83702 botto@idahoconservation.com

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Anthony Yankel **Idaho Irrigation Pumpers Association, Inc.** 12700 Lake Avenue, Unit 2505 Lakewood, OH 44107 tony@yankel.net



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Preston N. Carter Deborah E. Nelson **Attorney for Auric Solar, LLC** 601 West Bannock Street Boise, ID 83702 prestoncarter@givenspursley.com den@givenspursley.com

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PETITION OF IDAHO IRRIGATION PUMPERS ASSOCIATION, INC. FOR LEAVE TO INETERVENE– Page 4 CASE NO. IPC-E-18-15

City of Boise

Abigail R. Germaine Deputy City Attorney Boise City Attorney's Office 150 North Capitol Boulevard P.O. Box 500 Boise, ID 83701-0500 agermaine@cityofboise.org



U.S. Mail Hand Delivered Overnight Mail Telecopy (Fax) Electronic Mail (Email)

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PETITION OF IDAHO IRRIGATION PUMPERS ASSOCIATION, INC. FOR LEAVE TO INETERVENE– Page 5 CASE NO. IPC-E-18-15

Snake River Alliance

NW Energy Coalition John R. Hannond, Jr. FISHER PUSCH LLP 101 South Capitol Boulevard, Suite 701 P.O. Box 1308 Boise, ID 83701 jrh@fisherpusch.com wwilson@snakeriveralliance.org diego@nwenergy.org

Intermountain Wind and Solar, LLC

Ryan B. Frazier Brian W. Burnett KIRTON McCONKIE 50 East South Temple, Suite 400 P.O. Box 45120 Salt Lake City, UT 84111 <u>rfrazier@kmclaw.com</u> <u>bburnett@kmclaw.com</u>

Doug Shipley Intermountain Wind and Solar, LLC 1953 West 2425 South Wood Cross, UT 84087 doug@imwindandsolar.com

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Rebecca Berls, Paralegal Echo Hawk & Olsen