

Peter J. Richardson
ISB No. 3195
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

RECEIVED
2019 JUN -4 PM 3:42
IDAHO PUBLIC
UTILITIES COMMISSION

BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE PETITION OF)
IDAHO POWER COMPANY TO STUDY THE)
FIXED COSTS OF PROVIDING ELECTRIC)
SERVICE TO CUSTOMERS.)
)
)
)
)
)
)
)

CASE NO. IPC-E-18-16
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 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-18-15. 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-18-16 was filed at the offices of the Idaho Public Utilities Commission and served by U.S. Mail postage prepaid and electronically to:

The City of Boise:

Abigail R. Germaine
Deputy City Attorney
BOISE CITY ATTORNEY'S OFFICE
150 N. Capitol Blvd.
P.O. Box 500 Boise, Idaho 83701
agermaine@cityofboise.org

The Idaho Conservation League:

Benjamin J. Otto
710 N. 6th St.
Boise, ID 83702
botto@idahoconservation.org

The Idaho Irrigation Pumpers Association:

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

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

Idahydro:

C. Tom Arkoosh
Arkoosh Law Offices
PO Box 2900
Boise, Idaho 83701
tom.arkoosh@arkoosh.com
erin.cecil@arkoosh.com

The Idaho Clean Energy Association:

Preston Carter
Givens Pursley LLP
601 W Bannock Street
Boise, Idaho 83702
prestoncarter@givenspursley.com

Idaho Sierra Club:

Kelsey Jae Nunez
Kelsey Jae Nunez LLC
920 Clover Drive
Boise, Idaho 83703
kelsey@kelseyjaenunez.com

Zack Waterman
Mike Heckler
Idaho Sierra Club
503 West Franklin Street
Boise, Idaho 83702
zack.waterman@sierraclub.org
michael.p.heckler@gmail.com

Northwest Energy Coalition:

F. Diego Rivas
NW Energy Coalition
1101 8th Avenue
Helena, Montana 59601
diego@nwenergy.org

Avista Corporation:

David J. Meyer
Avista Corporation
PO Box 3727
Spokane, WA 99220
david.meyer@avistacorp.com

Patrick Ehrbar
Avista Corporation
PO Box 3727
Spokane, WA 99220
patrick.ehrbar@avistacorp.com
joe.miller@avistacorp.com

Idaho Power Company:

Lisa Nordstrom
Timothy E. Tatum
Connie Aschenbrenner
Regulatory Dockets
Idaho Power Company
1221 West Idaho Street
Boise, Idaho 83702
lnordstrom@idahopower.com
dockets@idahopower.com
ttatum@idahopower.com
caschenbrenner@idahopower.com



Kandi Walters

Vote Solar:

David Bender
Earthjustice
3916 Nakoma Road
Madison, WI 53711
dbender@earthjustice.org

Briana Kobor
358 S 700 E, Suite 8206
Salt Lake City, UT 84102
briana@votesolar.org

Idaho Public Utilities Commission:

Diane Hanian
Commission Secretary
Idaho Public Utilities Commission
472 West Washington Street
Boise, ID 83702
Diane.hanian@puc.idaho.gov

Sean Costello
Deputy Attorney General
Idaho Public Utilities Commission
472 West Washington Street
Boise, Idaho 83702
sean.costello@puc.idaho.gov

Rocky Mountain Power:

Ted Weston
Yvonne R. Hogle
Rocky Mountain Power
1407 West North Temple, Suite 330
Salt Lake City, UT 84116
ted.weston@pacificorp.com
yvonne.hogle@pacificorp.com