Peter J. Richardson ISB No. 3195 Richardson Adams, PLLC 515 N. 27<sup>th</sup> 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 1019 MAY 28 PM 3: 38 IDAHO PUBLIC ITILITIES COMMISSION

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#### **BEFORE THE**

# IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER'S APPLICATION TO EVALUATE SCHEDULE 84 – NET METERING.

CASE NO. IPC-E-19-15

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 and pursuant to Order No. 34335 issued in the above captioned matter, 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. 27<sup>th</sup> 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. Granting this Intervenor's petition to intervene will not unduly broaden the issues nor will it prejudice any party to this case.

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**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 28<sup>th</sup> day of May 2019

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Peter J. Richardson RICHARDSON ADAMS, PLLC

# CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 28<sup>th</sup> day of May 2019, a true and correct copy of the within and foregoing PETITION TO INTERVENE BY THE INDUSTRIAL CUSTOMERS OF IDAHO POWER in Docket No. IPC-E-19-15 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 -0500 agermaine@)cityofboise.org

#### The Idaho Conservation League:

Benjamin J. Otto 710 N. 6<sup>th</sup> St. Boise, ID 83702 <u>botto@idahoconservation.org</u>

#### 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

#### The Idaho Clean Energy Association:

Idaho Clean Energy Association PO Box 2264 Boise, ID 83701

Preston N. Carter Givens Pursley LLP 601 West Bannock St. Boise, ID 83702 prestoncarter@givenspursley.com kendrah@givenspursley.com

# Mr. Russell Schiermeier:

Russell Schiermeier 29393 Davis Road Bruneau, ID 83604 buy.hay@gmail.com

# **Idaho Sierra Club:**

Zack Waterman Mike Heckler 503 West Franklin St. Boise, ID 83702 zack.waterman@sierraclub.org mike.p.heckler@gmail.com

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# Idaho Power Company:

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# **Vote Solar:**

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#### Idaho Public Utilities Commission:

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