

RECEIVED
2020 MAR 13 AM 10: 22

IDAHO PUBLIC UTILITIES COMMISSION

richardsonadams.com
Tel: 208-938-7900 Fax: 208-938-7904
P.O. Box 7218 Boise, ID 83707 - 515 N. 27th St. Boise, ID 83702

March 12, 2020

## VIA FIRST CLASS MAIL

Diane Hanian Commission Secretary Idaho Public Utilities Commission P.O. Box 83720 Boise, ID 83720-0074 diane.hanian@puc.idaho.gov

Re: Case No. IPC-E-19-19

Petition to Intervene – Industrial Customers of Idaho Power

Dear Ms. Hanian:

Enclosed please find the original document of the Industrial Customers of Idaho Power's Petition to Intervene in Case No. IPC-E-19-19, as well as seven additional copies. I've also included an additional eighth copy along with a prepaid return envelope. At your convenience, please return this copy timestamped by the IPUC for our records.

If you have any questions, please contact me at (208) 938-7900 or assistant@richardsonadams.com.

Sincerely,

Grace Hansen

Administrative Assistant

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

2020 MAR 13 AM 10: 25

IDAHO PUBLIC ATILITIES COMMISSION

# **BEFORE THE**

# IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER COMPANY'S 2019 INTEGRATED RESOURCE PLAN	) CASE NO. IPC-E-19-19 )
	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 Commission Order No. 34572 (Notice of Intervention Deadline) 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' cost of electric power and quality of service may be affected by the outcomes of this docket.
- 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.
- 4. 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 electrical rates.
- 5. This intervention is timely and will not unduly broaden the issues presented for the Commission's determination.

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 12th day of March 2020

Peter J. Richardson

RICHARDSON ADAMS, PLLC

#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 12<sup>th</sup> day of March 2020, I delivered true and correct copies of the foregoing PETITION TO INTERVENE to the following parties via the indicated method:

USPS First-Class Mail:
Diane Hanian
Commission Secretary
Idaho Public Utilities Commission
P.O. Box 83720
Boise, ID 83720-0074
diane.hanian@puc.idaho.gov
(Original and seven copies)

Electronic Mail:
Edward Jewell
Deputy Attorney General
Idaho Public Utilities Commission
P.O. Box 83720
Boise, ID 83720-0074
edward.jewell@puc.idaho.gov

Benjamin J. Otto Idaho Conservation League 710 N. 6<sup>th</sup> Street Boise, ID 83702 botto@idahoconservation.org

Lisa D. Nordstrom Idaho Power Company 1221 West Idaho Street (83702) P.O. Box 70 Boise, ID 83707 Inordstrom@idahopower.com dockets@idahopower.com Timothy E. Tatum
Matthew Larkin
Idaho Power Company
1221 West Idaho Street (83702)
P.O. Box 70
Boise, ID 83707
ttatum@idahopower.com
mlarkin@idahopower.com

C. Tom Arkoosh Arkoosh Law Offices 802 W. Bannock St., Ste LP 103 P.O. Box 2900 Boise, ID 83701 tom.arkoosh@arkoosh.com erin.cecil@arkoosh.com

Grace Hansen

Administrative Assistant