

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](mailto:peter@richardsonadams.com)  
Attorneys for the Industrial Customers of Idaho Power

BEFORE THE  
IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE PETITION OF THE ) APPLICATION OF IDAHO POWER ) COMPANY FOR AN ORDER APPROVING ) DEFERRED ACCOUNTING OF ) INCREMENTAL COSTS ASSOCIATED WITH ) THE COVID-19 PUBLIC HEALTH ) EMERGENCY. )	CASE NO. IPC-E-20-19  PETITION TO INTERVENE OF THE INDUSTRIAL CUSTOMERS OF IDAHO POWER
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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. 27<sup>th</sup> St  
P.O. Box 7218  
Boise, Idaho 83702  
Telephone: (208) 938-7901  
Fax: (208) 938-7904  
[peter@richardsonadams.com](mailto: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](mailto: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’ rates for electric service 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 the ICIP intervenor status will not result in disruption of this proceeding, prejudice existing parties, nor unduly broaden the issues.

**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 8<sup>th</sup> day of April 2020.



Peter J. Richardson  
RICHARDSON ADAMS, PLLC

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 8<sup>th</sup> of April 2020, a true and correct copy of the within and foregoing FIRST PRODUCTION REQUEST OF THE INDUSTRIAL CUSTOMERS OF IDAHO POWER TO IDAHO POWER in Docket No. IPC-E-20-19 was served, pursuant to Commission Order No. 34602, exclusively via electronic mail to:

Idaho Public Utilities Commission  
Diane Hanian, Secretary  
[Diane.hanian@puc.idaho.gov](mailto:Diane.hanian@puc.idaho.gov)  
[Edward.jewell@puc.idaho.gov](mailto:Edward.jewell@puc.idaho.gov)

Idaho Power Company  
[lnordstrom@idahopower.com](mailto:lnordstrom@idahopower.com)  
[dockets@idahopower.com](mailto:dockets@idahopower.com)  
[mlarkin@idahopower.com](mailto:mlarkin@idahopower.com)

By: 

Peter Richardson,  
Attorney for the Industrial Customers of Idaho Power