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IDAHO PUBLIC
UTILITIES COMMISSION

BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER)
COMPANY'S APPLICATION FOR A) CASE NO. IPC-E-21-04
DETERMINATION OF 2020 DEMAND-SIDE)
MANAGEMENT EXPENSES AS) PETITION TO INTERVENE
PRUDENTLY INCURRED) 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 that Notice of Application and Notice of Intervention Deadline in
Order No. 34986 issued on April 6, 2021 and 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
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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' 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 the rates its members pay for electric service.

6. Granting this Intervenor's petition to intervene will not unduly broaden the issues nor will it prejudice any party to this case.

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 19th day of April 2021



Peter J. Richardson
RICHARDSON ADAMS, PLLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 19th day of April 2021, 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-21-04 was served electronically to:

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