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IDAHO PUBLIC
UTILITIES COMMISSION

Attorneys for IdaHydro

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER
COMPANY'S APPLICATION FOR
APPROVAL OF THE CAPACITY
DEFICIENCY TO BE UTILIZED FOR
AVOIDED COST CALCULATIONS

) Case No. IPC-E-21-09

) **IDAHYDRO'S PETITION TO**
) **INTERVENE**

) **AND**

) **JOINDER IN INDUSTRIAL**
) **CUSTOMERS OF IDAHO POWER'S**
) **MOTION TO STAY PROCEDURAL**
) **SCHEDULE PENDING DISCOVERY**
) **OPPORTUNITY**

) **AND**

) **JOINDER IN INDUSTRIAL**
) **CUSTOMERS OF IDAHO POWER'S**
) **WRITTEN PROTEST IN**
) **OPPOSITION TO PROCEEDING**
) **PURSUANT TO MODIFIED**
) **PROCEDURE**

COMES NOW the Idaho Hydroelectric Power Producers Trust, an Idaho Trust, d/b/a IdaHydro ("IdaHydro"), by and through its counsel of record, C. Tom Arkoosh of Arkoosh Law Offices, and pursuant to the Idaho Public Utilities Commission Rules of Procedure, IDAPA 31.01.01.071-073, 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 the intervenor is:

IdaHydro
c/o C. Tom Arkoosh
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Copies of all pleadings, production requests, production responses, Commission orders and other documents should be provided as noted above.

2. This Intervenor, IdaHydro is a confederacy of Idaho small hydroelectric producers joined in a trust for mutual benefit, consisting of approximately 90 MW of capacity produced by 33 small hydroelectric plants. All its members currently sell electric power and energy to Idaho Power pursuant to multiple contracts and have the potential to sell additional electric power and energy at other possible cogeneration and small power production locations in Idaho. IdaHydro members all have Surrogate Avoided Resource pricing and Schedule 72 operation and maintenance. Therefore, IdaHydro claims a direct and substantial interest in this proceeding in that the prices it receives for electrical sales and costs it pays to Idaho Power may be affected by the outcome of this proceeding.

3. IdaHydro 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 the prices it

receives for electric sales and costs it pays to Idaho Power.

WHEREFORE, IdaHydro 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 fully participate in these proceedings.

Furthermore, IdaHydro hereby joins the Industrial Customers of Idaho Power's *Motion to Stay Procedural Schedule Pending Discovery Opportunity and Written Protest in Opposition to Proceeding Pursuant to Modified Procedure*.

DATED this 14th of June 2021.

ARKOOSH LAW OFFICES



C. Tom Arkoosh
Attorney for IdaHydro

CERTIFICATE OF MAILING

I HEREBY CERTIFY that on the 14th of June 2021, I served a true and correct copy of the foregoing document(s) upon the following person(s), in the manner indicated:

Commission Secretary
Idaho Public Utilities Commission
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Boise, ID 83702

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