

Rose Monahan, CA Bar No. 329861 (*pro hac vice* pending)
Sierra Club
2101 Webster Street, Suite 1300
Oakland, California 94612
Phone: (415) 977-5704
Email: rose.monahan@sierraclub.org

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IDAHO PUBLIC
UTILITIES COMMISSION

Attorney for the Sierra Club

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER
COMPANY'S APPLICATION FOR
AUTHORITY TO INCREASE ITS RATES
FOR ELECTRIC SERVICE TO RECOVER
COSTS ASSOCIATED WITH THE JIM
BRIDGER POWER PLANT

CASE NO. IPC-E-21-17

PETITION TO INTERVENE OF
SIERRA CLUB

COMES NOW the Sierra Club and hereby requests leave to intervene in the above captioned matter pursuant to the Idaho Public Utilities Commission Rules of Procedure, IDAPA 31.01.01.071-073. As discussed below, Sierra Club has direct and substantial interests in these proceedings, and therefore should be granted intervention.

1. The name and address of Sierra Club's national headquarters is:

Sierra Club
2101 Webster Street, Suite 1300
Oakland, California 94612
(415) 977-5704
rose.monahan@sierraclub.org

2. The Sierra Club is a national non-profit environmental and conservation association incorporated under the laws of the State of California. Sierra Club is dedicated to the protection of public health and the environment. Sierra Club petitions to intervene in this proceeding on behalf of its nearly 3,750 members who live and purchase utility services

in Idaho, many of whom are residential customers of Idaho Power Company. Sierra Club claims a direct and substantial interest in this proceeding on behalf of our members who are customers of Idaho Power Company because the outcome will impact customer rates. Sierra Club will respond to Idaho Power Company's request to increase its rates to recover costs associated with the Jim Bridger Power Plant, and thus will not unduly broaden the issues or prejudice any party to this case.

3. Sierra Club, in its capacity as a representative of its Idaho members, 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. Without the opportunity to intervene herein, Sierra Club would be without any means of participating in this proceeding, which may have a material impact on the rates its members pay for electric service.
4. Sierra Club requests that copies all future pleadings, production requests, production responses, Commission orders, and other documents to the names and addresses listed below. In the interest of conserving natural resources and reducing the costs to all parties, please provide copies of all documents via electronic mail in accordance with IDAPA Rules 31.01.01.063.02-03.

Rose Monahan
Sierra Club
2101 Webster Street, Suite 1300
Oakland, California 94612
(415) 977-5704
rose.monahan@sierraclub.org

Ana Boyd
Sierra Club
2101 Webster St., Suite 1300
Oakland, CA 94612
(415) 977-5649
ana.boyd@sierraclub.org

WHEREFORE, Sierra Club 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 14th day of July 2021



Rose Monahan
Sierra Club

CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of July 2021, I delivered true and correct copies of the foregoing **PETITION TO INTERVENE** to the following persons via the method of service indicated below:



Ana Boyd
Sierra Club

Electronic mail only (see Order 35058)

Idaho Public Utilities Commission
Jan Noriyuki, Secretary
secretary@puc.idaho.gov

Karl Klein
karl.klein@puc.idaho.gov

Idaho Power Company
Lisa D. Nordstrom
Matt Larkin
lnordstrom@idahopower.com
mlarkin@idahopower.com
dockets@idahopower.com

Industrial Customers of Idaho Power
Peter J. Richardson
Richardson Adams, PLLC
peter@richardsonadams.com

Dr. Don Reading
dreading@mindspring.com

Idaho Conservation League
Benjamin J. Otto
botto@idahoconservation.org

City of Boise
Ed Jewell
BoiseCityAttomey@cityofboise.org
ejewell@cityofboise.org