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IDAHO PUBLIC  
UTILITIES COMMISSION

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

**IN THE MATTER OF IDAHO )  
POWER COMPANY'S )  
APPLICATION TO INITIATE A ) CASE NO. IPC-E-21-21  
MULTI-PHASE COLLABORATIVE )  
PROCESS FOR THE STUDY OF ) CLEAN ENERGY OPPORTUNITIES  
COSTS, BENEFITS, AND ) FOR IDAHO  
COMPENSATION OF NET EXCESS )  
ENERGY ASSOCIATED WITH ) PETITION TO INTERVENE  
CUSTOMER ON-SITE )  
GENERATION )**

Pursuant to IDAPA 31.01.01.042, Clean Energy Opportunities for Idaho (“CEO”) hereby submits this petition to intervene in the above-captioned matter. As discussed below, CEO has direct and substantial interests in these proceedings and should be granted intervention.

1. The name of this intervenor is:

Clean Energy Opportunities for Idaho  
Michael Heckler  
Courtney White  
3778 Plantation River Drive, Suite 102  
Boise, ID 83703  
[mike@cleanenergyopportunities.com](mailto:mike@cleanenergyopportunities.com)  
[courtney@cleanenergyopportunities.com](mailto:courtney@cleanenergyopportunities.com)

This Intervenor’s attorney is:

Kelsey Jae (ISB No. 7899)  
Law for Conscious Leadership  
920 N. Clover Dr., Boise, Idaho 83703  
Ph: (208) 391-2961  
[kelsey@kelseyjae.com](mailto:kelsey@kelseyjae.com)

Please provide copies of all pleadings, production requests, production responses, Commission orders, and other documents to the names and addresses above. In the interest of conserving natural resources and reducing the costs to all parties, please serve hard copies of pleadings, testimony, and briefs only, unless otherwise provided by Order. Production requests, responses, notices, Commission orders, and other filings may be submitted via electronic mail in accordance with IPUC Rules 31.01.01.063.02-03.

2. CEO is a non-profit corporation incorporated under the laws of the State of Idaho.

3. CEO has a direct and substantial interest in this proceeding. The organization was founded with a mission to bring problem-solving rigor and solution-focused approaches to advance clean energy and better serve the long-term interests of Idahoans and future generations. The need to bring these skills and approach into clean energy related dockets was an impetus for founding the organization. The purpose of CEO's efforts - the reduction of greenhouse gas emissions - is directly affected by an accelerated development of clean distributed energy resources. In this docket, CEO is especially focused on the use of appropriate accounting techniques and other methods for estimating and quantifying the costs and benefits associated with such resources. CEO seeks those reductions while ensuring that the long-term interests of Idahoans are given fair consideration. The organization aims to contribute from a perspective informed by collaborative problem-solving approaches and multiple stakeholder interests as the issues associated with accelerated retirement of coal plants are contemplated.

4. CEO's participation as an intervenor in this proceeding will not unduly broaden the issues or delay the proceeding. CEO respects the scope of this docket and is pursuing interests that fall outside this scope via other dockets and other venues. CEO's involvement in this

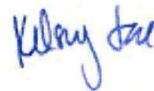
proceeding will not be duplicative of other parties in this proceeding because no other party adequately represents CEO's interests while also offering advanced analytical skills gained via graduate-level business degrees and private sector experience in business analysis.

5. CEO intends to fully participate in this matter as a party. The nature and quality of CEO's intervention in the proceeding is dependent upon the nature and effect of other evidence in this proceeding. If necessary, CEO may introduce evidence, be heard in argument, and call, examine, and cross-examine witnesses. CEO intends to seek intervenor funding pursuant to IDAPA 31.01.01.161-165.

WHEREFORE, CEO respectfully requests the Commission grant this petition.

DATED this 15th day of August, 2021.

Respectfully submitted,



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Kelsey Jae  
Attorney for CEO



## CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of August, 2021, I delivered true and correct copies of the foregoing PETITION TO INTERVENE to the following persons via the method of service noted:

### Electronic Mail Delivery (See Order No. 34602)

#### *Idaho Public Utilities Commission*

Jan Noriyuki  
Commission Secretary  
[secretary@puc.idaho.gov](mailto:secretary@puc.idaho.gov)

#### *Idaho PUC Staff*

Erick Shaner  
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Idaho Public Utilities Commission  
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#### *Idaho Power Company*

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#### *IdaHydro*

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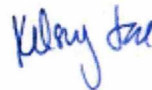
#### *Idaho Conservation League*

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#### *Industrial Customers of Idaho Power*

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