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Attorneys for the Industrial Customers of Idaho Power

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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 COSTS,)	PETITION TO INTERVENE
BENEFITS, AND COMPENSATION OF NET)	OF THE INDUSTRIAL CUSTOMERS
EXCESS ENERGY ASSOCIATED WITH)	OF IDAHO POWER
CUSTOMER ON-SITE GENERATION)	
_____)	

COMES NOW, The Industrial Customers of Idaho Power, hereinafter referred to as "Intervenor" or the "ICIP" and pursuant to the Rules of Procedure, Rule 71 IDAPA 31.01.01.71 of the Idaho Public Utilities Commission ("Commission") and hereby petitions the Commission for leave to intervene herein and to appear and participate herein as a party. In support of said Petition to Intervene the ICIP says as follows:

I
INTRODUCTION – BACKGROUND

Idaho Power Company ("Idaho Power") initiated this docket on June 25, 2021, for the purposes of, inter alia, initiating a multi-phase process for a comprehensive study of the costs and benefits of on-site generation.

II.
PETITION TO INTERVENE

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

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 the economics and ability of its members to participate in on-site generation projects will likely be affected by the outcome of this proceeding.

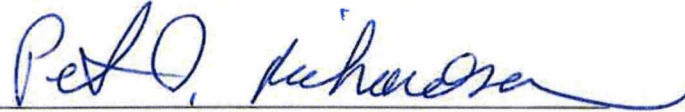
This Intervenor, in its capacity as a representative of industrial customers intends to participate herein as a party, and if necessary, to introduce evidence, cross-examine witnesses, call and examine witnesses, and be heard in argument. The nature and quality of evidence which this Intervenor will introduce is dependent upon the nature and effect of other evidence in this proceeding.

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 ability of its members to engage in on-site generation projects.

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 30th day of June 2021

A handwritten signature in blue ink, appearing to read "Peter J. Richardson", is written over a horizontal line.

Peter J. Richardson
RICHARDSON ADAMS, PLLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 30th day of June 2021, a true and correct copy of the within and foregoing PETITION TO INTERVENE OF THE INDUSTRIAL CUSTOMERS OF IDAHO POWER in Docket No. IPC-E-21-21 was served electronically to:

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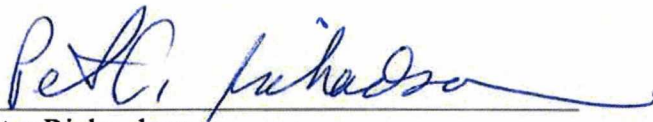
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