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Attorneys for IdaHydro

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

21-21 IN THE MATTER OF IDAHO POWER Case No. IPC-E-21-09 COMPANY'S APPLICATION TO INITIATE A MULTI-PHASE **IDAHYDRO'S PETITION TO** COLLABORATIVE PROCESS FOR THE **INTERVENE** STUDY OF COSTS, BENEFITS, AND COMPENSATION OF NET EXCESS **ENERGY ASSOCIATED WITH CUSTOMER ON-SITE GENERATION**

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 Arkoosh Law Offices 913 W. River Street, Suite 450 P.O. Box 2900 Boise, ID 83701

Telephone:

(208) 343-5105

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With an email copy to: erin.cecil@arkoosh.com

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.

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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.

DATED this 2nd day of July 2021.

ARKOOSH LAW OFFICES

C. Tom Arkoosh

Attorney for IdaHydro

CERTIFICATE OF MAILING

I HEREBY CERTIFY that on the 2nd day of July 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 11331 W. Chinden Blvd., Building 8, Suite 201-A P.O. Box 83720 Boise, ID 83720-0074	U.S. Mail, Postage Prepaid Overnight Courier Hand Delivered Via Facsimile X E-mail: secretary@puc.idaho.gov
Matt Hunter Idaho Public Utilities Commission 11331 W. Chinden Blvd., Building 8, Suite 201-A P.O. Box 83720 Boise, ID 83720-0074	U.S. Mail, Postage Prepaid Overnight Courier Hand Delivered Via Facsimile X E-mail: matt.hunter@puc.idaho.gov
Idaho Power: Lisa D. Nordstrom Idaho Power Company 1221 West Idaho Street (83702) P.O. Box 70 Boise, ID 83707	U.S. Mail, Postage Prepaid Overnight Courier Hand Delivered Via Facsimile X E-mail: lnordstrom@idahopower.com dockets@idahopower.com
Connie Aschenbrenner Idaho Power Company 1221 West Idaho Street (83702) P.O. Box 70 Boise, ID 83707	U.S. Mail, Postage Prepaid Overnight Courier Hand Delivered Via Facsimile E-mail: cashenbrenner@idahopower.com

Idaho Conservation League and NW Energy Coalition: Benjamin J. Otto Idaho Conservation League 710 N. 6 th Street Boise, ID 83706	X	U.S. Mail, Postage Prepaid Overnight Courier Hand Delivered Via Facsimile E-mail: botto@idahoconservation.org
NW Energy Coalition: F. Diego Rivas NW Energy Coalition 1101 8 th Ave. Helena, MT 59601	X	U.S. Mail, Postage Prepaid Overnight Courier Hand Delivered Via Facsimile E-mail: diego@nwenergy.org
Idaho Irrigation Pumpers Association, Inc.: Eric L. Olsen ECHO HAWK & OLSEN, PLLC 505 Pershing Ave., Ste. 100 P.O. Box 6119 Pocatello, ID 83205	X	U.S. Mail, Postage Prepaid Overnight Courier Hand Delivered Via Facsimile E-mail: elo@echohawk.com
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Industrial Customers of Idaho Power: Peter J. Richardson RICHARDSON ADAMS, PLLC 515 N. 27 th St. P.O. Box 7218 Boise, ID 83702	U.S. Mail, Postage Prepaid Overnight Courier Hand Delivered Via Facsimile X E-mail: peter@richardsonadams.com
Dr. Don Reading 6070 Hill Road Boise, ID 83703	U.S. Mail, Postage Prepaid Overnight Courier Hand Delivered Via Facsimile X E-mail: dreading@mindspring.com

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	C. Tom	Arkoosh