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Attorneys for Cox Communications

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER)
COMPANY’S PETITION FOR)
APPROVAL OF A CUSTOMER)
SURCHARGE AND MODIFIED LINE)
ROUTE CONFIGURATION FOR)
CONSTRUCTION OF A NEW 138 kV)
TRANSMISSION LINE IN THE WOOD)
RIVER VALLEY)
)
)
)

Case No. IPC-E-21-25

**COX COMMUNICATIONS’
AMENDED PETITION TO
INTERVENE**

COMES NOW Cox Communications (“Cox”), by and through its counsel of record, C. Tom Arkoosh of Arkoosh Law Offices, and hereby petitions to intervene in the above-captioned matter pursuant to the Rules of Procedure of the Idaho Public Utilities Commission (IDAPA 31.01.01.071, *et seq.*) and the Commission’s *Order No. 35194, Notice of Application, and Notice of Intervention Deadline*, issued on October 12, 2021.

In support of this Petition, Cox provides as follows:

1. Cox is duly authorized to do and is doing business in the State of Idaho.
2. Cox is engaged in the commercial cable television service and telecommunications business as a service corporation.
3. Cox has a direct and substantial interest in the above-captioned matter. Currently, Cox provides digital services to the north portion of Blaine County in part via hardware currently

attached to Idaho Power's present transmission facilities serving the north portion of Blaine County and wishes to attach hardware to the transmission line proposed in the above-entitled case.

4. Cox desires to assure that there will be continued room for their equipment on any new construction resulting from the requested Certificate of Public Convenience and Necessity for the Wood River Valley. The exclusion of Cox from the pending proceedings could result in extreme and substantial hardship, needless expense, and redundant proceedings and processes.

5. Intervention by Cox will not unduly broaden these issues in this matter because manner of construction, equipment used therefor, and placement of equipment are directly before the Commission in the pending Application on file.

6. Intervention by Cox is in the public interest because settlement of the issues regarding placement and cost of the new facilities contemplated by the prayed-for Certificate of Public Convenience and Necessity are currently directly before the Commission in the pending Application.

7. Intervention by Cox will not cause delay or prejudice to the parties in the above-captioned matter because the issues of interest to Cox are currently squarely before the Commission.

8. Intervention by Cox is appropriate to allow Cox to present to the Commission the perspective regarding the most effective and efficient means and manner to accommodate the continued carriage of telecommunication facilities on the new transmission line contemplated by the Application.

9. Cox represents its intervention in the pending matter will not prejudice any party, but instead will streamline resolution of concrete issues that the construction of the facilities

contemplated by the Application has placed before the Commission.

10. The name and address of the intervenor is:

Cox Communications
c/o C. Tom Arkoosh
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Electronic copies only to:
Mark DiNunzio
Mark.DiNunzio@cox.com

Copies of all pleadings, production requests, production responses, Commission orders and other documents should be provided as noted above.

Wherefore, Cox respectfully prays the Commission issue its order allowing Cox's intervention in the above-entitled matter.

DATED this 2nd day of November 2021.

ARKOOSH LAW OFFICES



C. Tom Arkoosh
Attorney for Cox Communications

CERTIFICATE OF MAILING

I HEREBY CERTIFY that on the 2nd day of November 2021, I served a true and correct copy of the foregoing document(s) upon the following person(s), in the manner indicated:

| | | |
|-----------------------------------|--------------|--|
| Commission Secretary | _____ | U.S. Mail, Postage Prepaid |
| Idaho Public Utilities Commission | _____ | Overnight Courier |
| 472 W. Washington | _____ | Hand Delivered |
| Boise, ID 83702 | _____ | Via Facsimile |
| | <u> X </u> | E-mail: |
| | | secretary@puc.idaho.gov |

| | | |
|-----------------------------|--------------|--|
| Idaho Power Company: | _____ | U.S. Mail, Postage Prepaid |
| | _____ | Overnight Courier |
| Donovan E. Walker | _____ | Hand Delivered |
| Idaho Power Company | _____ | Via Facsimile |
| PO Box 70 | <u> X </u> | E-mail: |
| Boise, ID 83707 | | dwalker@idahopower.com |
| | | dockets@idahopower.com |

| | | |
|-------------------------|--------------|--|
| Blaine County: | _____ | U.S. Mail, Postage Prepaid |
| | _____ | Overnight Courier |
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| Williams Bradbury, P.C. | _____ | Via Facsimile |
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| | | |
|-----------------------------------|--------------|--|
| Timothy K. Graves | _____ | U.S. Mail, Postage Prepaid |
| Chief Deputy Prosecuting Attorney | _____ | Overnight Courier |
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| MW Analytics, Energy & Utilities | _____ | Overnight Courier |
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