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Attorneys for the Industrial Customers of Idaho Power

BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER)	
COMPANY'S APPLICATION FOR)	CASE NO. IPC-E-21-32
APPROVAL TO MODIFY ITS DEMAND)	
RESPONSE PROGRAMS)	PETITION TO INTERVENE
)	OF THE INDUSTRIAL CUSTOMERS
)	OF IDAHO POWER
)	
)	

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 pursuant to Commission Order No. 35214, 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" or the "Power Company") initiated this docket on October 1, 2021, for the purposes of modifying its demand response programs and to revise the cost-effectiveness methodology for evaluating those programs. The Power Company offers demand response programs to just three of its customer classes, one of which is the industrial class of customers.

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
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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 nature of demand response programs offered to the industrial customers will likely be affected by the outcome of this proceeding. In addition, the cost-effectiveness measure of demand response programs will have an ultimate impact on the retail rates the industrial customers end up paying the Power Company for their electric service.


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 availability of demand response programs offered to the industrial class of customers and may also have a material impact on the electric rates the ICIP members pay to the Power Company.

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 5th day of November 2021


Peter J. Richardson
RICHARDSON ADAMS, PLLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 5th day of November 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-21-32 was served electronically to:

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