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*Attorney for Intervenor Idaho Irrigation Pumpers Association, Inc.*

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

**IN THE MATTER OF IDAHO POWER  
COMPANY'S APPLICATION TO  
MODIFY ITS DEMAND RESPONSE  
PROGRAMS**

**CASE NO. IPC-E-21-32**

**PETITION OF IDAHO IRRIGATION  
PUMPERS ASSOCIATION, INC.  
FOR LEAVE TO INTERVENE**

COMES NOW Idaho Irrigation Pumpers Association, Inc. herein called "this Intervenor" and pursuant to Rules 71 through 73 of the Rules of Procedure of the Idaho Public Utility Commission, and by this Petition asks leave to intervene and to appear and participate as a party herein, and as basis therefor states as follows:

- 1) The name and address of Intervenor is:

Idaho Irrigation Pumpers Association, Inc.  
c/o Amy McKoon  
1222 W. 90 S.  
Blackfoot, ID 83221

This Intervenor will be represented by:

Eric L. Olsen  
ECHO HAWK & OLSEN, PLLC  
505 Pershing Ave., Ste. 100  
P.O. Box 6119  
Pocatello, Idaho 83205

and requests that copies of all pleadings and production requests and responses should be provided to the following:

Eric L. Olsen  
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AEGIS INSIGHT  
4801 W. Yale Ave.  
Denver, CO 80219  
[lance@aegisinsight.com](mailto:lance@aegisinsight.com)

2) This Intervenor and its members have a direct and substantial interest in this proceeding. Currently over 300 MW of Irrigator interruptions participate in the peak rewards program. Any revisions or modifications to this program directly impact the Irrigators and therefore we intend to participate in all respects herein as a party as may be required to represent its interests.

3) Without the opportunity to intervene herein, this Intervenor would be without a manner or means of participating in the lawful determination of issues which will result in affecting its rates for electric service.

WHEREFORE, this Intervenor requests that this Commission grant this Intervenor's leave to intervene in these proceedings and to appear and participate in all matters as may be necessary and appropriate.

DATED this 6<sup>th</sup> day of October, 2021.

ECHO HAWK & OLSEN



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ERIC L. OLSEN

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 6<sup>th</sup> day of October, 2021, I served a true, correct and complete copy of the Petition of Idaho Irrigation Pumpers Association, Inc. for Leave to Intervene to each of the following, via U.S. Mail or private courier, email or hand delivery, as indicated below:

Jan Noriyuki, Secretary  
**Idaho Public Utilities Commission**  
P.O. Box 83720  
11331 W. Chinden Blvd.  
Building 8, Suite 201-A  
Boise, ID 83714  
[jan.noriyuki@puc.idaho.gov](mailto:jan.noriyuki@puc.idaho.gov)

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Telecopy (Fax)
- Electronic Mail (Email)

Lisa D. Nordstrom  
**Idaho Power Company**  
1221 West Idaho Street (83702)  
P.O. Box 70  
Boise, Idaho 83707  
[lnordstrom@idahopower.com](mailto:lnordstrom@idahopower.com)

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- Hand Delivered
- Overnight Mail
- Telecopy (Fax)
- Electronic Mail (Email)



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ERIC L. OLSEN