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IDAHO PUBLIC UTILITIES COMMISSION

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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 TO EXPAND)	CASE NO. IPC-E-21-40
OPTIONAL CUSTOMER CLEAN ENERGY)	
OFFERINGS THROUGH THE CLEAN)	PETITION TO INTERVENE
ENERGY YOUR WAY PROGRAM)	OF THE INDUSTRIAL CUSTOMERS
)	OF IDAHO POWER
)	

COMES NOW, The Industrial Customers of Idaho Power, hereinafter referred to as "Intervenor," and pursuant to this Commission's Rules of Procedure, Rule 71 IDAPA 31.01.01.71, 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 this Intervenor is:

Industrial Customers of Idaho Power
c/o Peter J. Richardson
Richardson Adams, PLLC
515 N. 27th St
P.O. Box 7218
Boise, Idaho 83702
Telephone: (208) 938-7901
Fax: (208) 938-7904
peter@richardsonadams.com

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

2. 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 its members' rates for electric service in the future may be affected by the outcome of this proceeding as well as their ability to participate in the Company's clean energy offerings to its customers, including its industrial customers.

3. 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.

5. 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 their retail electric rates.

6. Granting the ICIP intervenor status will not result in disruption of this proceeding, prejudice existing parties, nor unduly broaden the issues.

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 16th day of December 2021



Peter J. Richardson
RICHARDSON ADAMS, PLLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 16th of December 2021, a true and correct copy of the within and foregoing PETITION TO INTERVENE OF THE INDUSTRIAL CUSTOMERS OF IDAHO POWER TO IDAHO POWER in Docket No. IPC-E-21-40 was served, pursuant to Commission Order No. 34602, exclusively via electronic mail to:

Idaho Public Utilities Commission
Jan Noriyuki, Secretary
jan.noriyuki@puc.idaho.gov
secretary@puc.idaho.gov

Idaho Power Company
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By: 

Peter Richardson,
Attorney for the Industrial Customers of Idaho Power