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IDAHO PUBLIC UTILITIES COMMISSION

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*Attorney for the Clean Energy Opportunities of Idaho*

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

**IN THE MATTER OF IDAHO )  
POWER COMPANY'S ) CASE NO. IPC-E-21-42  
APPLICATION FOR APPROVAL OF )  
SPECIAL CONTRACT AND TARIFF ) CLEAN ENERGY OPPORTUNITIES  
SCHEDULE 33 TO PROVIDE ) FOR IDAHO  
ELECTRIC SERVICE TO BRISBIE, ) PETITION TO INTERVENE  
LLC'S DATA CENTER FACILITY )**

Pursuant to IDAPA 31.01.01.042, Clean Energy Opportunities for Idaho (“CEO”) hereby submits this petition to intervene in the above-captioned matter. As discussed below, CEO has direct and substantial interests in these proceedings, and therefore should be granted intervention.

1. The name of this intervenor is:

Clean Energy Opportunities for Idaho  
Courtney White & Mike Heckler  
3778 Plantation River Drive, Suite 102  
Boise, ID 83703  
[courtney@cleanenergyopportunities.com](mailto:courtney@cleanenergyopportunities.com)  
[mike@cleanenergyopportunities.com](mailto:mike@cleanenergyopportunities.com)

This Intervenor’s attorney is:

Kelsey Jae (ISB No. 7899)  
Law for Conscious Leadership  
920 N. Clover Dr., Boise, Idaho 83703  
Ph: (208) 391-2961  
[kelsey@kelseyjae.com](mailto:kelsey@kelseyjae.com)

Please provide copies of all pleadings, production requests, production responses, Commission orders, and other documents to the names and addresses above. In the interest of conserving natural resources and reducing the costs to all parties, all documents and other filings may be submitted via electronic mail in accordance with IPUC Rules 31.01.01.063.02-03 and Order 35058.

2. CEO is a non-profit corporation incorporated under the laws of the State of Idaho.

3. CEO has a direct and substantial interest in this proceeding. The organization was founded with a mission to bring problem-solving rigor and solution-focused approaches to advance clean energy and better serve the long-term interests of Idahoans and future generations. The need to bring these skills and approach into clean energy related dockets was an impetus for founding the organization. A key purpose of CEO's efforts is the reduction of greenhouse gas emissions. As the first specific example of a "Clean energy your way" program implementation and, with large portions of the direct testimony of the Idaho Power representatives redacted, CEO believes its active participation in this docket is essential to ensure that it can effectively participate in other related, dockets such as IPC-E-21-40. CEO aims to contribute from a perspective informed by collaborative problem-solving approaches and multiple stakeholder interests.

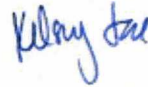
4. CEO's participation as an intervenor in this proceeding will not unduly broaden the issues or delay the proceeding because CEO's interest is directly related to the subjects addressed in Idaho Power's application. CEO's involvement in this proceeding will not be duplicative of other parties in this proceeding because no other party adequately represents CEO's interests.

5. CEO intends to fully participate in this matter as a party. The nature and quality of CEO's intervention in the proceeding is dependent upon the nature and effect of other evidence in this proceeding. If necessary, CEO may introduce evidence, be heard in argument, and call, examine, and cross-examine witnesses. CEO intends to seek intervenor funding pursuant to IDAPA 31.01.01.161-165.

WHEREFORE, CEO respectfully requests the Commission grant this petition.

DATED this 3rd day of February, 2022.

Respectfully submitted,



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Kelsey Jae  
Attorney for CEO

## CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of February, 2022. I delivered true and correct copies of the foregoing PETITION TO INTERVENE to the following persons via the method of service noted:

### Electronic Mail Delivery

*Idaho Public Utilities Commission*

Jan Noriyuki

Commission Secretary

[secretary@puc.idaho.gov](mailto:secretary@puc.idaho.gov)

*Idaho PUC Staff*

Riley Newton

Deputy Attorney General

Idaho Public Utilities Commission

[riley.newton@puc.idaho.gov](mailto:riley.newton@puc.idaho.gov)

*Idaho Power Company*

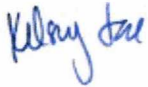
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