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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)	CASE NO. IPC-E-21-43
POWER COMPANY'S 2021)	
INTEGRATED RESOURCE PLAN)	CLEAN ENERGY OPPORTUNITIES
)	FOR IDAHO
)	PETITION TO INTERVENE
)	

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
mike@cleanenergyopportunities.com

This Intervenor’s attorney is:

Kelsey Jae (ISB No. 7899)
Law for Conscious Leadership
920 N. Clover Dr., Boise, Idaho 83703
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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. One of CEO's principals, Michael Heckler, has participated actively as a member of the Integrated Resource Plan Advisory Council for many years. Based on that experience as well as upon references made in un-redacted portions of testimony submitted in IPC-E-21-42, CEO believes that participating in and having access to reviews of the IRP data and analyses will be essential to ensure that, in addition to participating in a thorough review of the IRP offering itself, CEO can also effectively participate in dockets such as IPC-E-21-40 and IPC-E-21-42 that will inherently rely heavily upon those IRP analyses and data. 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

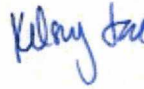
in Idaho Power's application. CEO's involvement in this proceeding will not be duplicative of other parties in this proceeding because no other party adequately represents CEO's interests.

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,



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

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