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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 FOR	)	CASE NO. IPC-E-22-06
APPROVAL OF A REPLACEMENT SPECIAL	)	
CONTRACT WITH MICRON TECHNOLOGY,	)	PETITION TO INTERVENE
INC. AND A POWER PURCHASE	)	OF THE INDUSTRIAL CUSTOMERS
AGREEMENT WITH BLACK MESA	)	OF IDAHO POWER
ENERGY, LLC.	)	

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. 27<sup>th</sup> St  
Boise, Idaho 83702  
Telephone: (208) 938-7901  
Fax: (208) 938-7904  
[peter@richardsonadams.com](mailto: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:

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Dr. Don Reading  
6070 Hill Road  
Boise, Idaho 83703  
(208) 342-1700 Tel  
(208) 383-0401 Fax  
[dreading@mindspring.com](mailto: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.

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.

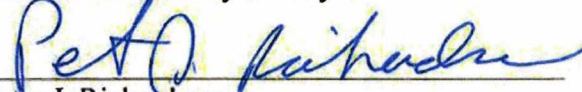
5. Without the opportunity to intervene herein, this Intervenor would be without any means of participation in this proceeding which may have a material impact on their retail electric rates.

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 6th day of May 2022

  
Peter J. Richardson  
RICHARDSON ADAMS, PLLC

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 6th day of May 2022, 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-22-06 was served, pursuant to Commission Order No. 35375, exclusively via electronic mail to:

Idaho Public Utilities Commission  
Jan Noriyuki, Secretary  
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By:   
Peter Richardson,  
Attorney for the Industrial Customers of Idaho Power