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IDAHO PUBLIC
UTILITIES COMMISSION

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

**IN THE MATTER OF IDAHO)
POWER COMPANY'S)
APPLICATION TO COMPLETE)
THE STUDY REVIEW PHASE OF) CASE NO. IPC-E-22-22
THE COMPREHENSIVE STUDY)
OF COSTS AND BENEFITS OF) CLEAN ENERGY OPPORTUNITIES
ON-SITE CUSTOMER) FOR IDAHO PETITION TO
GENERATION & FOR) INTERVENE
AUTHORITY TO IMPLEMENT)
CHANGES TO SCHEDULES 6, 8,)
AND 84)**

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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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, please serve hard copies of pleadings, testimony, and briefs only. Production requests, responses, notices, Commission orders, and other filings may be submitted via electronic mail in accordance with IPUC Rules 31.01.01.063.02-03.

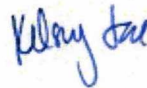
2. CEO is a nonprofit corporation incorporated under the laws of the State of Idaho.
3. CEO has a direct and substantial interest in this proceeding. A key focus of CEO's efforts is the reduction of greenhouse gas emissions. One CEO priority is to expand customer choice in effecting the emission characteristics of the energy they consume. The issues associated with expanding customer alternatives for clean energy are integral to this docket. CEO aims to contribute from a perspective informed by collaborative problem-solving approaches and multiple stakeholder interests, consistent with the organization's goals for advancing clean energy and better serving the long-term interests of Idahoans and future generations.
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 11th day of July, 2022.

Respectfully submitted,



Kelsey Jae
Attorney for CEO

CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of July, 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 (See Order No. 34602)

Idaho Public Utilities Commission

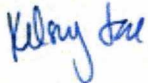
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