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Peter J. Richardson ISB No. 3195 Richardson Adams, PLLC 515 N. 27<sup>th</sup> Street Boise, Idaho 83702 Telephone: (208) 938-7901 Fax: (208) 938-7904 peter@richardsonadams.com

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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 THE ) COMPREHENSIVE STUDY OF COSTS AND ) BENEFITS OF ON-SITE CUSTOMER ) GENERATION & FOR AUTHORITY TO ) IMPLEMENT CHANGES TO SCHEDULES 6, ) 8, AND 84.

Attorneys for the Industrial Customers of Idaho Power

CASE NO. IPC-E-2-22

PETITION TO INTERVENE 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. 27<sup>th</sup> St 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 280 S. Silverwood Way Eagle, Idaho 83616 (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' ability to net meter electrical production 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 ability to net meter electrical production.

**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

Industrial Customers of Idaho Power Petition to Intervene IPC-E-22-22 Page 2 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 22<sup>nd</sup> day of July 2022

aharson Peter J. Richardson

**RICHARDSON ADAMS, PLLC** 

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 22<sup>nd</sup> day of July 2022, I delivered true and correct copies of the foregoing PETITION TO INTERVENE of the Industrial Customers in IPUC Docket No. IPC-E-22-22 to the following persons via electronic mail only pursuant to IPUC Order No. 34602:

Idaho Public Utilities Commission Jan Noriyuki Commission Secretary <u>Secretary@puc.idaho.gov</u> Jan.noriyuki@puc.idaho.gov

Idaho Power Company Lisa Nordstrom Megan Goicoechea Allen Timothy E. Tatum Connie G. Aschenbrenner Grant Anderson Inordstrom@idahopower.com mgoicoecheaalen@idahopower.com dockets@idahopower.com ttatum@idahopower.com caschenbrenner@idahopower.com ganderson@idahopower.com

Clean Energy Opportunities for Idaho Courtney White Mike Heckler Kelsey Jae <u>courtney@cleanenergyopportunities.com</u> <u>mike@cleanenergyopportunities.com</u> <u>kelsey@kelseyjae.com</u>

Industrial Customers of Idaho Power Petition to Intervene IPC-E-22-22 Page 3 Idaho PUC Staff Riley Newton Deputy Attorney General <u>riley.newton@puc.idaho.gov</u>

Idaho Conservation League Emma E. Sperry esperry@idahoconservation.org

IdaHydro C. Tom Arkoosh tom.arkoosh@arkoosh.com amber.dresslar@arkoosh.com erin.cecil@arkoosh.com

Idaho Irrigation Pumpers Association Eric L. Olsen Lance Kaufman <u>elo@echohawk.com</u> lance@bardwellconsulting.com

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