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Attorneys for the Federal Executive Agencies

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION)	
OF IDAHO POWER COMPANY FOR)	Case No. IPC-E-23-11
AUTHORITY TO INCREASE ITS RATES)	
AND CHARGES FOR ELECTRIC SERVICE)	THE FEDERAL EXECUTIVE
IN THE STATE OF IDAHO AND FOR)	AGENCIES' PETITION TO
ASSOCIATED REGULATORY)	INTERVENE
ACCOUNTING TREATMENT.)	

THE FEDERAL EXECUTIVE AGENCIES' PETITION TO INTERVENE

The United States Department of Energy (“DOE”), on behalf of itself and other federal executive agencies (together, the “Federal Executive Agencies” or “FEA”), hereby petitions the Idaho Public Utilities Commission (the “Commission”) pursuant to the Commission’s Rules of Procedure, IDAPA 31.01.01.071, to intervene and become a party in this proceeding. In support of this petition, DOE states:

1. The name and address of the Petitioner is:

Federal Executive Agencies
c/o U.S. Department of Energy
1000 Independence Ave., S.W.
Washington, D.C. 20585

Copies of all pleadings, production requests, production responses, Commission orders, and other documents should be provided to:

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2. In this proceeding, Idaho Power Company (“IPC”) proposes a total rate increase of approximately 8.6% or \$111.3 million.

3. FEA has a direct and substantial interest in the subject matter of this proceeding. FEA consists of agencies of the United States Government that have offices, facilities, and installations, including the Idaho National Laboratory (“INL”) and Mountain Home U.S. Air Force Base, that purchase electricity from IPC. INL is one of IPC’s largest customers and is a “special contract” customer under IPC’s retail electric tariff.

4. FEA intends to participate in this proceeding as a party in all respects that may be required for it to represent its interests, including submission of direct and responsive testimony, examination and cross-examination of witnesses, submission of briefs, and presentation of and response to motions and oral argument.

5. Granting FEA’s Petition to Intervene will not unduly broaden the issues, nor will it prejudice any party to this case.

6. Without the opportunity to intervene, FEA could not participate in the lawful determination of issues which will have a material effect on the rates, terms, and conditions under which it receives service.

7. DOE has been delegated authority by the General Services Administration to represent the consumer interest of the FEA in this proceeding under 40 U.S.C. §§ 501(c) and 121(d). Consistent with Rule 5.5 of the Idaho Rules of Professional Conduct and Commentary note [1], the appearance of a lawyer authorized by federal statute or other federal law to represent the interests of the United States before an Idaho tribunal does not constitute the unauthorized practice of law, even though such lawyer is not admitted to the bar of Idaho or through *pro hac vice* admission. Peter Meier is an active member, in good standing, of the bar of Maryland and is an attorney employed by DOE. Paige Anderson is an active member, in good standing, of the bar of Colorado and is an attorney employed by DOE. Neither Mr. Meier nor Ms. Anderson is admitted to the bar of Idaho. Tanner Crowther is an active member, in good standing, of the bar of Idaho and is an attorney employed by DOE.

WHEREFORE, FEA respectfully requests that this Commission grant this Petition to Intervene in this proceeding and to present evidence, call and examine witnesses, present argument, and to otherwise fully participate in this proceeding.

Respectfully submitted, this July 13, 2023.

**FEDERAL EXECUTIVE AGENCIES
BY THE U.S. DEPARTMENT OF ENERGY**

/s/ Peter Meier
Peter Meier
Attorney-Adviser

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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION)
OF IDAHO POWER COMPANY FOR) **Case No. IPC-E-23-11**
AUTHORITY TO INCREASE ITS RATES)
AND CHARGES FOR ELECTRIC SERVICE) **CERTIFICATE OF SERVICE**
IN THE STATE OF IDAHO AND FOR)
ASSOCIATED REGULATORY)
ACCOUNTING TREATMENT.)

I CERTIFY that on this date I sent by email a true and correct copy of **THE FEDERAL EXECUTIVE AGENCIES’ PETITION TO INTERVENE** on the parties of record to this proceeding.

DATED this July 13, 2023.

/s/ Peter Meier
Peter Meier
Attorney-Adviser

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