C. Tom Arkoosh, ISB No. 2253 ARKOOSH LAW OFFICES 913 W. River Street, Suite 450 P.O. Box 2900 Boise, ID 83701

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Attorneys for IdaHydro

## BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

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

COMES NOW the Idaho Hydroelectric Power Producers Trust, an Idaho Trust, d/b/a IdaHydro ("IdaHydro"), by and through its counsel of record, C. Tom Arkoosh of Arkoosh Law Offices, and pursuant to the Idaho Public Utilities Commission Rules of Procedure, IDAPA 31.01.071-073, hereby petitions the Commission for leave to intervene herein and to appear and participate herein as a party, and as grounds therefor states as follows:

1. The name and address of the intervenor is:

IdaHydro c/o C. Tom Arkoosh Arkoosh Law Offices 913 W. River Street, Suite 450 P.O. Box 2900 Boise, ID 83701

Telephone: (208) 343-5105 Facsimile: (208) 343-5456 Email: tom.arkoosh@arkoosh.com

With an email copy to: <a href="mailto:erin.cecil@arkoosh.com">erin.cecil@arkoosh.com</a>

Copies of all pleadings, production requests, production responses, Commission orders and other documents should be provided as noted above.

2. This Intervenor IdaHydro is a confederacy of Idaho small hydroelectric producers joined in a trust for mutual benefit, consisting of approximately 90 MW of capacity produced by 34 small hydroelectric plants. All its members currently sell electric power and energy to Idaho Power pursuant to multiple contracts and have the potential to sell additional electric power and energy at other possible cogeneration and small power production locations in Idaho. Therefore, IdaHydro claims a direct and substantial interest in this proceeding in that the prices it receives for electrical sales and the costs it pays to Idaho Power may be affected by the outcome of this

proceeding.

3. IdaHydro intends to participate herein as a party and, if necessary, to introduce evidence, call and examine witnesses, cross-examine witnesses, and be heard in argument. The nature and quality of evidence that this Intervenor will introduce are dependent upon the nature and effect of other evidence in this proceeding.

4. 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 the prices it receives for electric sales and the costs it pays to Idaho Power.

WHEREFORE, IdaHydro 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 fully participate in these proceedings.

DATED this 20<sup>th</sup> day of June 2023.

ARKOOSH LAW OFFICES

C. Tom Arkoosh *Attorney for IdaHydro* 

## **CERTIFICATE OF MAILING**

I HEREBY CERTIFY that on the 20<sup>th</sup> day of June 2023, I served a true and correct copy of the foregoing document(s) upon the following person(s), in the manner indicated:

IDAHO PUBLIC UTILITIES COMMISSION: Jan Noriyuki Commission Secretary Idaho Public Utilities Commission 11331 W. Chinden Blvd., Building 8, Suite 201-A (83714) P.O. Box 83720 Boise, ID 83720-0074		U.S. Mail, Postage Prepaid Overnight Courier Hand Delivered Via Facsimile E-mail: jan.noriyuki@puc.idaho.gov secretary@puc.idaho.gov
IDAHO PUBLIC UTILITIES COMMISSION STAFF: Chris Burdin Deputy Attorney General Idaho Public Utilities Commission 11331 W. Chinden Blvd., Building 8, Suite 201-A (83714) P.O. Box 83720 Boise, ID 83720-0074	 X	U.S. Mail, Postage Prepaid Overnight Courier Hand Delivered Via Facsimile E-mail: chris.burdin@puc.idaho.gov
IDAHO POWER: Lisa D. Nordstrom Donovan E. Walker Megan Goicoechea Allen Timothy Tatum Connie Aschenbrenner Matt Larkin Idaho Power Company 1221 W. Idaho Street (83702) P.O. Box 70 Boise, ID 83707	 <u>X</u>	U.S. Mail, Postage Prepaid Overnight Courier Hand Delivered Via Facsimile E-mail: lnordstrom@idahopower.com dwalker@idahopower.com mgoicoecheaallen@idahopower.com ttatum@idahopower.com caschenbrenner@idahopower.com mlarkin@idahopower.com dockets@idahopower.com

CLEAN ENERGY OPPORTUNITIES FOR IDAHO: Kelsey Jae Law for Conscious Leadership 920 N. Clover Dr. Boise, ID 83703	U.S. Mail, Postage Prepaid Overnight Courier Hand Delivered Via Facsimile X E-mail: kelsey@kelseyjae.com
Michael Heckler Courtney White Clean Energy Opportunities for Idaho 3778 Plantation River Dr., Ste. 102 Boise, ID 83703	U.S. Mail, Postage Prepaid Overnight Courier Hand Delivered Via Facsimile X E-mail: courtney@cleanenergyopportunities.com mike@cleanenergyopportunities.com
IDAHO IRRIGATION PUMPERS ASSOCIATION, INC.: Eric L. Olsen ECHO HAWK & OLSEN, PLLC 505 Pershing Ave., Ste. 100 P.O. Box 6119 Pocatello, ID 83205	U.S. Mail, Postage Prepaid Overnight Courier Hand Delivered Via Facsimile E-mail: elo@echohawk.com
Lance Kaufman, Ph.D. 2623 NW Bluebell Place Corvallis, OR 97330	U.S. Mail, Postage Prepaid Overnight Courier Hand Delivered Via Facsimile E-mail: lance@aegisinsight.com
INDUSTRIAL CUSTOMERS OF IDAHO POWER: Peter J. Richardson Richardson Adams, PLLC 515 N. 27 <sup>th</sup> St. (83702) P.O. Box 7218 Boise, ID 83707	U.S. Mail, Postage Prepaid Overnight Courier Hand Delivered Via Facsimile X E-mail: peter@richardsonadams.com
Dr. Don Reading 280 Silverwood Way Eagle, ID 83616	U.S. Mail, Postage Prepaid Overnight Courier Hand Delivered Via Facsimile X E-mail: dreading@mindspring.com  C. Tom Arkoosh