

Kelsey Jae (ISB No. 7899)
Law for Conscious Leadership
920 N. Clover Dr.
Boise, ID 83703
Phone: (208) 391-2961
kelsey@kelseyjae.com
Attorney for the Clean Energy Opportunities for Idaho

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

**IN THE MATTER OF IDAHO)
POWER COMPANY’S)
APPLICATION FOR AUTHORITY)
TO IMPLEMENT CHANGES TO) CASE NO. IPC-E-23-14
THE COMPENSATION)
STRUCTURE APPLICABLE TO) CLEAN ENERGY OPPORTUNITIES
CUSTOMER ON-SITE) FOR IDAHO
GENERATION UNDER) PETITION TO INTERVENE
SCHEDULES 6, 8, AND 84 AND TO)
ESTABLISH AN EXPORT CREDIT)
RATE METHODOLOGY)**

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

Ph: (208) 391-2961
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, all documents and other filings may be submitted via electronic mail in accordance with IPUC Rules 31.01.01.063.02-03 and Order 35058.

2. CEO is a non-profit corporation incorporated under the laws of the State of Idaho.

3. CEO has a direct and substantial interest in this proceeding. The organization was founded with a mission to bring problem-solving rigor and solution-focused approaches to advance clean energy and better serve the long-term interests of Idahoans and future generations. The need to bring these skills and approach into clean energy related dockets was an impetus for founding the organization. CEO has intervened and actively participated in past dockets in related subject matter, as well as filing a Petition seeking decisions on issues to be addressed in this docket (*see* IPC-E-22-12). CEO has a direct and substantial interest in continuing to participate in these issues through this proceeding. Without an opportunity to intervene herein, CEO would not have an adequate means of fully participating in the determination of matters related to those issues. CEO aims to contribute from a perspective informed by collaborative problem-solving approaches and multiple stakeholder interests.

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 18th day of May, 2023.

Respectfully submitted,



Kelsey Jae
Attorney for CEO

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of May, 2023. 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

Idaho Public Utilities Commission

Jan Noriyuki

Commission Secretary

secretary@puc.idaho.gov

Idaho PUC Staff

Riley Newton

Chris Burdin

Deputy Attorney General

Idaho Public Utilities Commission

riley.newton@puc.idaho.gov

chris.burdin@puc.idaho.gov

Idaho Power Company

Megan Goicoechea Allen

Lisa D. Nordstrom

mgoicoecheaallen@idahopower.com

lnordstrom@idahopower.com

dockets@idahopower.com



Kelsey Jae

Attorney for CEO

Idaho Conservation League

Marie Callaway Kellner

mkellner@idahoconservation.org

IdaHydro

Tom Arkoosh

tom.arkoosh@arkoosh.com

erin.cecil@arkoosh.com

Idaho Irrigation Pumpers Association, Inc.

Eric L. Olsen

Lance Kaufman

elo@echohawk.com

lance@aegisinsight.com