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Attorneys for IdaHydro

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER)	Case No. IPC-E-23-27
COMPANY’S APPLICATION FOR)	
APPROVAL OF THE CAPACITY)	IDAHYDRO’S PETITION TO
DEFICIENCY PERIOD TO BE UTILIZED)	INTERVENE
FOR AVOIDED COST CALCULATIONS)	
)	
)	
)	

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 31.01.01.071-073, 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
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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. IdaHydro members all have Surrogate Avoided Resource pricing and Schedule 72 operation and maintenance. 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 17th day of November 2023.

ARKOOSH LAW OFFICES



C. Tom Arkoosh
Attorney for IdaHydro

CERTIFICATE OF MAILING

I HEREBY CERTIFY that on the 17th day of November 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:**

Commission Secretary
Idaho Public Utilities Commission
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Boise, ID 83720-0074

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 Via Facsimile
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**IDAHO PUBLIC UTILITIES
COMMISSION STAFF:**

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IDAHO POWER:

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