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Attorney for the Clean Energy Opportunities of Idaho

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

**IN THE MATTER OF IDAHO)
POWER COMPANY’S)
APPLICATION FOR A CPCN FOR)
THE BOISE BENCH BATTERY)
STORAGE FACILITY)
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**CASE NO. IPC-E-24-16
CLEAN ENERGY OPPORTUNITIES
FOR IDAHO
PETITION TO INTERVENE**

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)
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920 N. Clover Dr., Boise, Idaho 83703
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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, please serve hard copies of pleadings, testimony, and briefs only. Production requests, responses, notices, Commission orders, and other filings may be submitted via electronic mail in accordance with IPUC Rules 31.01.01.063.02-03.

2. CEO is a nonprofit 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. As indicated in Eric Hackett’s testimony, with the exception of the PowerEx market purchase, the ranks of final shortlisted 2026 projects all involved solar or BESS or both resource types.¹ Increasing reliance on variable energy resources such as solar directly affect the value of using historical costing approaches based on peak hour requirements.² Further, a decision resulting in the issuance of a CPCN for the acquisition of a 150MW BESS would directly affect the valuation of additional solar and battery resources in the Company’s next Integrated Resource Planning process.³ CEO has a direct and substantial interest in continuing to participate in

¹ See IPC-E-24-16, Hackett Direct, Table 3, page 39.

² See IPC-E-24-16, Ellsworth Direct at page 8: “However, as the wider industry, and the Company, experience increased reliance on variable energy resources, whose hour-to-hour and season-to-season generation changes, it is no longer viable to only contemplate peak hour requirements.”

³ See IPC-E-24-16, Ellsworth Direct at page 26: “When solar PV and battery storage additions become unbalanced via large additions of one and not the other, the result is a lower ELCC for the resource that was added, and a higher ELCC for the resource that was not added. This is occurring in 2026 given the large quantity of battery storage the Company is adding in 2025, and

dockets relating to the timing of high risk hours and the associated costs and the valuation of energy resources. 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.

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.

6. CEO requests the Commission grant this Petition to Intervene despite its filing after the intervention deadline. Due to its small staffing level (two individuals) and matters that staff recently faced related to family health issues, CEO has not been able to timely respond to Idaho Power's application in this docket. Upon reviewing the testimony in this docket, and in light of related issues raised by Staff in comments submitted under IPC-E-23-14⁴, CEO believes it essential to fully understand the matters raised in this case in order to most effectively perform its obligations for holding workshops⁵ related to how a supplemental hourly informed cost of service analysis could affect future time-of-use and other rate design matters. For that reason,

now further adding to this storage in 2026, resulting in a lower ELCC for energy storage facilities.”

⁴ See IPC-E-23-23, Staff Comments, Feb 15, 2024, pages 21-24.

⁵ See IPC-E-23-11, Stipulation and Settlement, section 13, page 11.

CEO has determined that it would be in its best interest to intervene in this case. CEO believes that its intervention will not prejudice any parties to this matter or otherwise delay this matter. CEO agrees to accept the record and the schedule for this case as it stands.

WHEREFORE, CEO respectfully requests the Commission grant this petition.

DATED this 21st day of May, 2024.

Respectfully submitted,

A handwritten signature in blue ink that reads "Kelsey Jae".

Kelsey Jae
Attorney for CEO

CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of May, 2024, 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 (See Order No. 34602)

Idaho Public Utilities Commission
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