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IDAHO PUBLIC UTILITIES COMMISSION

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Attorneys for Fall River Rural Electric Cooperative, Inc.

BEFORE THE

IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF)
PACIFICORP FOR APPROVAL OR)
REJECTION OF THE PURCHASE POWER)
AGREEMENT WITH CHESTER DIVERSION)
HYDRO PROJECT)

CASE NO. PAC-E-21-06

PETITION TO INTERVENE OF FALL
RIVER RURAL ELECTRIC
COOPERATIVE, INC.

_____)
Fall River Rural Electric Cooperative, Inc. ("Fall River") hereby petitions to intervene in this proceeding under the Idaho Public Utilities Commission ("Commission") Rule of Procedure, Rule 71 IDAPA 31.01.01.71, and as grounds therefore states as follows:

1. The name and address of this Intervenor is:

Fall River Rural Electric Cooperative, Inc.
c/o Bryan Case, CEO/General Manager
1150N 3400E
Ashton, ID 83420
Bryan.Case@fallriverelectric.com

Copies of all pleadings, production requests, production responses, Commission orders and other documents should be provided to Gregory M. Adams at the address noted above.

2. Fall River is the owner and operator of the hydroelectric facility, known as the "Chester Diversion Hydro Project," that is the subject of the power purchase agreement ("PPA")

submitted for approval in this proceeding, and Fall River is the counter party to Rocky Mountain Power in that PPA.

3. As the counter party to Rocky Mountain Power and owner and operator of the facility, Fall River possesses information that may assist the Commission in its consideration of the application in this proceeding. Additionally, Fall River has a direct and substantial interest in this proceeding as a party to the PPA at issue whose rights and obligations to operate and sell the output of its hydroelectric facility will be impacted by the outcome of this proceeding.

4. Fall River, through legal counsel, intends to participate herein as a party. Without the opportunity to intervene herein, Fall River would be without any means of participation in this proceeding which may have a material impact on its legal rights and obligations.

5. Granting Fall River's Petition to Intervene will not unduly broaden the issues beyond their proper scope, nor will it unduly prejudice any party to this case.

WHEREFORE, Fall River respectfully requests that this Commission grant this Petition to Intervene in these proceedings and to appear and participate in all matters as may be necessary and appropriate.

DATED: March 29, 2021.

RICHARDSON ADAMS, PLLC

By /s/ Gregory M. Adams

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 29th day of March 2021, I delivered true and correct copies of the foregoing PETITION TO INTERVENE to the following parties via electronic mail:

Jan Noriyuki
Commission Secretary
Idaho Public Utilities Commission
P.O. Box 83720
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Dated: March 29, 2021

/s/ Gregory M. Adams
Gregory M. Adams (ISB No. 7454)