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IDAHO PUBLIC
UTILITIES COMMISSION

Attorneys for PIIC

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION)	Case No. PAC-E-21-09
OF ROCKY MOUNTAIN POWER)	
REQUESTING APPROVAL OF \$16.1	PETITION OF PACIFICORP IDAHO
MILLION NET POWER COST DEFERRAL)	INDUSTRIAL CUSTOMERS
	FOR LEAVE TO INTERVENE

Pursuant to Rules 71 through 73 of the Idaho Public Utilities

Commission's Rules of Practice and Procedure, IDAPA 31.01.01.71 *et. seq.*, PacifiCorp

Idaho Industrial Customers ("PIIC") petitions the Idaho Public Utilities Commission (the
"Commission") for leave to intervene. In support of this Petition, PIIC states as follows:

- The name and address of PIIC is:
 PacifiCorp Idaho Industrial Customers c/o Williams Bradbury, P.C.
 P.O. Box 388
 Boise, ID 83701
- 2. PIIC will be represented in this proceeding by Williams Bradbury,
 P.C. All documents relating to these proceedings should be served on the following persons at the addresses listed:

Ronald L. Williams Williams Bradbury, P.C. P.O. Box 388, Boise ID, 83701 Telephone: 208-344-6633

E-mail: ron@williamsbradbury.com

Bradley Mullins MW Analytics, Energy & Utilities Email: <u>brmullins@mwanalytics.com</u>

[ELECTRONIC COPIES ONLY TO:]

Val Steiner Itafos Conda, LLC val.steiner@itafos.com Kyle Williams BYU Idaho williamsk@byui.edu Adam Gardner Idahoan Foods AGardner@idahoan.com

- 3. PIIC is a coalition of entities or organizations operating in Idaho that are industrial and large load customers of Rocky Mountain Power ("RMP" or the "Company"). The Company's application that the Commission approve \$16.1 million of deferred net power costs affects PIIC members. PIIC has a direct and substantial interest in this proceeding to review the accuracy and prudency of RMP's cost deferrals that will not be adequately represented by any other party. PIIC intends to participate in all respects of this proceeding and will not unreasonably broaden the issues, burden the record, or delay this proceeding.
- 4. Without the opportunity to intervene herein, PIIC would be without a manner or means of participating in the lawful determination of issues which will affect the rates for electric service from the Company to the PIIC members.

WHEREFORE, PIIC respectfully requests that the Commission grant its petition to intervene with full party status in this proceeding and to appear and participate in all matters as may be necessary and appropriate; and to present evidence, call and examine witnesses, cross-examine witnesses, present argument, and to otherwise fully participate in the proceedings.

Dated this 9th day of April 2019.

Respectfully submitted,

/s/ Ron Williams

Ronald L. Williams Williams Bradbury, P.C. Attorneys for PIIC

CERTIFICATE OF MAILING

I HEREBY CERTIFY that on this <u>9th</u> day of <u>April</u> 2021, I caused to be served a true and correct copy of the <u>Petition to Intervene</u> of the PacifiCorp Idaho Industrial Customers upon the following individuals in the manner indicated below:

Jan Norkyuki
Commission Secretary
Idaho Public Utilities Commission
P.O. Box 83720, Boise ID 83720-0074
11331 W. Chinden Blvd, Bldg. 8, Suite
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Boise, ID 83714
Jan.noriyuki@puc.idaho.gov

Ted Weston Idaho Regulatory Affairs Manager Rocky Mountain Power 1407 West North Temple, Suite 330 Salt Lake City, UT 84116 E-Mail: ted.weston@pacificorp.com

Data Request Response Center PacificCorp 825 NE Multnomah, Suite 2000 Portland, OR 97232 E-Mail: datarequest@pacificorp.com

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/s/ Ronald L. Williams

Ronald L. Williams Williams Bradbury, P.C. Attorney for PIIC