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IDAHO PUBLIC
UTILITIES COMMISSION

Attorney for Intervenor Idaho Irrigation Pumpers Association, Inc.

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

**IN THE MATTER OF THE APPLICATION
OF ROCKY MOUNTAIN POWER FOR
AUTHORITY TO IMPLEMENT A
BATTERY DEMAND RESPONSE
PROGRAM**

CASE NO. PAC-E-21-16

**PETITION OF IDAHO IRRIGATION
PUMPERS ASSOCIATION, INC.
FOR LEAVE TO INTERVENE**

COMES NOW Idaho Irrigation Pumpers Association, Inc. herein called “this Intervenor” and pursuant to Rules 71 through 73 of the Rules of Procedure of the Idaho Public Utility Commission, and by this Petition asks leave to intervene and to appear and participate as a party herein, and as basis therefor states as follows:

- 1) The name and address of Intervenor is:

Idaho Irrigation Pumpers Association, Inc.
c/o Amy McKoon
1222 W. 90 S.
Blackfoot, ID 83221

This Intervenor will be represented by:

Eric L. Olsen
ECHO HAWK & OLSEN, PLLC
505 Pershing Ave., Ste. 100
P.O. Box 6119
Pocatello, Idaho 83205

and requests that copies of all pleadings and production requests and responses should be provided to the following:

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2) This Intervenor and its members have a direct and substantial interest in this proceeding and intend to participate in all respects herein as a party as may be required to represent its interests.

3) Without the opportunity to intervene herein, this Intervenor would be without a manner or means of participating in the lawful determination of issues which will result in affecting its rates for electric service.

WHEREFORE, this Intervenor requests that this Commission grant this Intervenor's leave to intervene in these proceedings and to appear and participate in all matters as may be necessary and appropriate.

DATED this 25th day of August, 2021.

ECHO HAWK & OLSEN



ERIC L. OLSEN

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 25th day of August, 2021, I served a true, correct and complete copy of the Petition of Idaho Irrigation Pumpers Association, Inc. for Leave to Intervene to each of the following, via U.S. Mail or private courier, email or hand delivery, as indicated below:

Jan Noriyuki, Secretary
Idaho Public Utilities Commission
P.O. Box 83720
11331 W. Chinden Blvd.
Building 8, Suite 201-A
Boise, ID 83714
jan.noriyuki@puc.idaho.gov

- U.S. Mail
- Hand Delivered
- Overnight Mail
- Telecopy (Fax)
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ERIC L. OLSEN