

Ronald L. Williams, ISB No. 3034  
Brandon Helgeson, ISB No. 11615  
HAWLEY TROXELL ENNIS & HAWLEY LLP  
877 W. Main Street, Suite 200  
P.O. Box 1617  
Boise, ID 83701-1617  
Telephone: 208.344.6000  
Facsimile: 208.954.5253  
Email: rwilliams@hawleytroxell.com  
bhelgeson@hawleytroxell.com

Attorneys For PIIC

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF ROCKY MOUNTAIN  
POWER'S APPLICATION FOR  
APPROVAL OF \$62.4 MILLION ECAM  
DEFERRAL

CASE NO. PAC-E-24-05

PETITION OF PACIFICORP IDAHO  
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:

1. The name and address of PIIC is:  
PacifiCorp Idaho Industrial Customers  
c/o Hawley Troxell Ennis & Hawley LLP  
877 W. Main Street  
P.O. Box 1617  
Boise, ID 83701

2. PIIC will be represented in this proceeding by Hawley Troxell Ennis & Hawley LLP. All documents relating to these proceedings should be served on the following persons at the addresses listed:

Ronald L. Williams  
Brandon Helgeson  
Hawley Troxell Ennis & Hawley LLP  
P.O. Box 1617, Boise ID, 83701  
Telephone: 208-388-6000  
E-mail: [rwilliams@hawleytroxell.com](mailto:rwilliams@hawleytroxell.com)  
[bhelgeson@hawleytroxell.com](mailto:bhelgeson@hawleytroxell.com)

Bradley Mullins  
MW Analytics  
Teitotie 2, Suite 208  
Oulunsalo Finland, FI-90460  
E-mail: [brmullins@mwanalytics.com](mailto:brmullins@mwanalytics.com)

**[ELECTRONIC COPIES ONLY TO:]**

Val Steiner	Kyle Williams
Itafos Conda, LLC	BYU Idaho
<a href="mailto:val.steiner@itafos.com">val.steiner@itafos.com</a>	<a href="mailto:williamsk@byui.edu">williamsk@byui.edu</a>

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 \$62.4 million of deferred net power costs affects PIIC members. PIIC has a direct and substantial interest in this proceeding to review the accuracy and prudence 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 26th day of April, 2024.

HAWLEY TROXELL ENNIS & HAWLEY LLP

By   
\_\_\_\_\_  
Ronald L. Williams, ISB No. 3034  
Brandon Helgeson, ISB No. 11615  
Attorneys For PIIC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I caused to be served a true copy of the foregoing PETITION OF PACIFICORP IDAHO INDUSTRIAL CUSTOMERS FOR LEAVE TO INTERVENE by the method indicated below, and addressed to each of the following:

Commission Secretary  
Idaho Public Utilities Commission  
11331 W. Chinden Blvd., Bldg. 8, Suite 201-A  
Boise, ID 83714  
[secretary@puc.idaho.gov](mailto:secretary@puc.idaho.gov)

- U.S. Mail, Postage Prepaid
- Hand Delivered
- Overnight Mail
- E-mail
- Facsimile
- iCourt

Data Request Response Center  
825 NE Multnomah St. Suite 2000  
Portland, OR 97232  
[datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)

- U.S. Mail, Postage Prepaid
- Hand Delivered
- Overnight Mail
- E-mail:
- Facsimile
- iCourt

Joe Dallas  
Rocky Mountain  
825 NE Multnomah, Suite 2000  
Portland, OR 97232  
[joseph.dallas@pacificorp.com](mailto:joseph.dallas@pacificorp.com)

- U.S. Mail, Postage Prepaid
- Hand Delivered
- Overnight Mail
- E-mail:
- Facsimile
- iCourt

Mark Adler  
Rocky Mountain Power  
1407 West North Temple, Suite 330  
Salt Lake City, UT 84116  
[mark.adler@pacificorp.com](mailto:mark.adler@pacificorp.com)

- U.S. Mail, Postage Prepaid
- Hand Delivered
- Overnight Mail
- E-mail:
- Facsimile
- iCourt

Brad Mullins  
Principal Consultant  
MW Analytics  
Teitotie 2, Suite 208  
Oulunsalo Finland, FI-90460  
[brmullins@mwanalytics.com](mailto:brmullins@mwanalytics.com)

- U.S. Mail, Postage Prepaid
- Hand Delivered
- Overnight Mail
- E-mail:
- Facsimile
- iCourt

Eric L. Olsen  
Echo Hawk & Olsen PLLC  
505 Pershing Ave., Suite 100  
PO Box 6119  
Pocatello, ID 83205  
[elo@echohawk.com](mailto:elo@echohawk.com)

- U.S. Mail, Postage Prepaid
- Hand Delivered
- Overnight Mail
- E-mail:
- Facsimile
- iCourt

Aegis Strategies  
Lance Kaufman:  
[lance@aegisinsight.com](mailto:lance@aegisinsight.com)

- U.S. Mail, Postage Prepaid
- Hand Delivered
- Overnight Mail
- E-mail:
- Facsimile
- iCourt

Thomas J. Budge  
Racine, Olson, PLLP  
201 E. Center  
PO Box 1391  
Pocatello, ID 83204-1391  
[tj@racineolson.com](mailto:tj@racineolson.com)

- U.S. Mail, Postage Prepaid
- Hand Delivered
- Overnight Mail
- E-mail:
- Facsimile
- iCourt

Brian C. Collins  
Greg Meyer  
Brubaker & Associates  
16690 Swingley Ridge Rd., #140  
Chesterfield, MO 63017  
[bcollins@consultbai.com](mailto:bcollins@consultbai.com)  
[gmeyer@consultbai.com](mailto:gmeyer@consultbai.com)

- U.S. Mail, Postage Prepaid
- Hand Delivered
- Overnight Mail
- E-mail:
- Facsimile
- iCourt

Val Steiner  
Itafos Conda, LLC  
[val.steiner@itafos.com](mailto:val.steiner@itafos.com)

- U.S. Mail, Postage Prepaid
- Hand Delivered
- Overnight Mail
- E-mail:
- Facsimile
- iCourt

Kyle Williams  
BYU Idaho  
[williamsk@byui.edu](mailto:williamsk@byui.edu)

- U.S. Mail, Postage Prepaid
- Hand Delivered
- Overnight Mail
- E-mail:
- Facsimile
- iCourt

Dated: April 26, 2024.

A handwritten signature in blue ink, appearing to read "Ronald L. Williams". The signature is fluid and cursive, with a long horizontal stroke at the end.

---

Ronald L. Williams, ISB No. 3034  
Brandon Helgeson, ISB No. 11615