



# ECHO HAWK & OLSEN

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April 19, 2018

**VIA OVERNIGHT MAIL**

Diane Hanian, Commission Secretary  
Idaho Public Utilities Commission  
472 W. Washington  
Boise, Idaho 83720-0074  
[diane.holt@puc.idaho.gov](mailto:diane.holt@puc.idaho.gov)

RECEIVED  
2018 APR 20 AM 9:24  
IDAHO PUBLIC  
UTILITIES COMMISSION

**Re: CASE No.: GNR-U-18-01  
IN THE MATTER OF THE APPLICATION REQUESTING AUTHORITY  
TO REDUCE RETAIL RATES BY \$2.8 MILLION TO PASS A PORTION  
OF THE 2017 FEDERAL TAX REFORM ACT COSTS SAVINGS ONTO  
CUSTOMERS**

Dear Ms. Hanian:

Enclosed you will find the original and seven (7) copies of the following:

1. Petition of Idaho Irrigation Pumpers Associations, Inc. for Leave to Intervene.

Electronic copies have been served per the Certificate of Service.

Please file the Petition in the case file. If you have any questions, please don't hesitate to call. Thank you.

Sincerely,

Eric L. Olsen

ELO/dm  
Enclosures

Eric L. Olsen (ISB# 4811)  
Joseph T. Preston (ISB #9082)  
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2018 APR 20 AM 9:24  
IDAHO PUBLIC  
UTILITIES COMMISSION

*Attorneys for Intervenor Idaho Irrigation Pumpers Association, Inc.*

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

**IN THE MATTER OF THE APPLICATION  
REQUESTING AUTHORITY TO REDUCE  
RETAIL RATES BY \$2.8 MILLION TO  
PASS A PORTION OF THE 2017 FEDERAL  
TAX REFORM ACT COSTS SAVINGS  
ONTO CUSTOMERS**

**CASE NO. GNR-U-18-01**

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

COMES NOW Idaho Irrigation Pumpers Association, Inc. herein called "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 herein, 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 Lynn Tominga  
P.O. Box 2624  
Boise, Idaho, 83701-2624

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  
Telephone: (208) 478-1624

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Email: [elo@echohawk.com](mailto:elo@echohawk.com)

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

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Anthony Yankel  
12700 Lake Avenue, Unit 2505  
Lakewood, Ohio 44107  
Email: [tony@yankel.net](mailto:tony@yankel.net)

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.

4) Good cause as to why this Petition was filed after the deadline established by the Commission is as follows:

- a. Intervenor regularly monitors PacifiCorp electric rate cases files with the Commission on the Commissions' website under the "Electric Cases" tab. During 2018 no PacifiCorp dba Rocky Mountain Power tax filings, notices of filings or intervention deadlines have been posted by the Commission on the website under the "Electric Cases" tab.

- b. In early April this Intervenor learned for the first time that PacifiCorp had formally filed on March 30, 2018 its Application pertaining to the 2017 Federal Tax Reform Act Cost Savings.
- c. In early April 2018 searching the Commission's website under this case, GNR-U-18-01, Intervenor was able to locate the Application of Rocky Mountain Power filed pursuant to Order No. 33965 initiating an investigation into the impact of the Federal Income Tax Legislation enacted December 22, 2017 ("Tax Reform Act") and the Company's proposed rate making treatment for the associated impacts. Upon seeing the Application, Intervenor filed herewith its Petition which was believed to be timely because the Company had not made any previous filings and no notices had been given.
- d. The Commission's Order No. 33991 dated February 22, 2018 states as follows:

"With this order, the Commission directed interested parties to file *Petitions to Intervene*, . . . as soon as practical and no later than Tuesday, March 6, 2018, as described below. These filings must name each rate-regulated utility in whose active settlement with Commission staff the Petitioner or requesting utility wants an opportunity to participate."
- e. This Intervenor has no knowledge of receiving Order No. 33991. If the Order was in fact received, Intervenor did not give heed or pay any attention to it because it was a GNR case and did not identify PacifiCorp as a party.
- f. To date the Commission has not given notice of PacifiCorp's Application filed March 30, 2018 and the Company did not serve the Application on this Intervenor as it does in most rate cases as a courtesy.
- g. There are no known active settlement discussions between the Company and Staff with respect to the Company's Application by reason of which there would be no

delay or prejudice to either by the granting of this late filed Application to Intervene.

5) Based on the foregoing, Intervenor respectfully submits that a good and substantial reason and good cause exists for the delay in filing its Petition which was made promptly and as soon as practicable after Intervenor became aware of the Commission's Order No. 33991.

WHEREFORE, this Intervenor requests that this Commission confirm this Intervenor's Petition for Leave to Intervene in these proceedings 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 other fully participate in the proceedings.

DATED this 19<sup>th</sup> day of April, 2018.

ECHO HAWK & OLSEN

By: 

ERIC L. OLSEN Attorney for  
Idaho Irrigation Pumpers Association, Inc.



## CERTIFICATE OF SERVICE

I hereby certify that on the 19<sup>th</sup> day of April 2018, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Diane M. Hanian, Secretary  
**Idaho Public Utilities Commission**  
P.O. Box 83702  
472 W. Washington Street  
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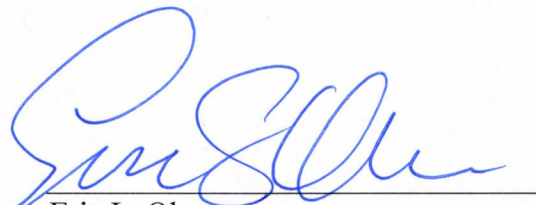
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