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Attorneys for the Industrial Customers of Idaho Power

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IDAHO PUBLIC  
UTILITIES COMMISSION

BEFORE THE  
IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF )	
IDAHO POWER COMPANY FOR DEFERRAL )	CASE NO. IPC-E-16-19
AND RECOVERY COSTS ASSOCIATED )	PETITION TO INTERVENE
WITH PARTICIPATION IN AN ENERGY )	OF THE INDUSTRIAL CUSTOMERS
IMBALANCE MARKET. )	OF IDAHO POWER
)	
)	
)	

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COMES NOW, The Industrial Customers of Idaho Power, hereinafter referred to as “Intervenor,” and pursuant to this Commission’s Rules of Procedure, Rule 71 IDAPA 31.01.01.71 and pursuant to that Notice of Application and Notice of Intervention Deadline issued in Commission Order No. 33595 on September 13, 2016, and hereby petitions the Commission for leave to intervene herein and to appear and participate herein as a party, and as grounds therefore states as follows:

1. The name and address of this Intervenor is:

Industrial Customers of Idaho Power  
c/o Peter J. Richardson  
Richardson Adams, PLLC  
515 N. 27<sup>th</sup> St  
P.O. Box 7218  
Boise, Idaho 83702  
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Fax: (208) 938-7904  
[peter@richardsonadams.com](mailto:peter@richardsonadams.com)

Copies of all pleadings, production requests, production responses, Commission orders and other documents should be provided to Peter Richardson as noted above and to:

Dr. Don Reading  
6070 Hill Road  
Boise, Idaho 83703  
(208) 342-1700 Tel  
(208) 383-0401 Fax  
[dreading@mindspring.com](mailto:dreading@mindspring.com)

2. This Intervenor, the Industrial Customers of Idaho Power, (“ICIP”) is an unincorporated association of Schedule 19 customers of Idaho Power. All ICIP members receive electric utility services from Idaho Power Company. The ICIP claims a direct and substantial interest in this matter in that its members’ rates for electric service may be affected by the outcome of this proceeding.

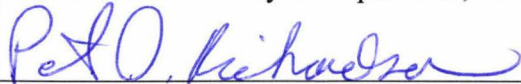
3. This Intervenor, in its capacity as a representative of industrial customers intends to participate herein as a party, and if necessary, to introduce evidence, cross-examine witnesses, call and examine witnesses, and be heard in argument. The nature and quality of evidence which this Intervenor will introduce is dependent upon the nature and effect of other evidence in this proceeding.

4. Without the opportunity to intervene herein, this Intervenor would be without any means of participation in this proceeding which may have a material impact on the rates its members pay for electric service.

5. Granting this Intervenor’s petition to intervene will not unduly broaden the issues nor will it prejudice any party to this case.

**WHEREFORE**, the Industrial Customers of Idaho Power respectfully requests that this Commission grant its Petition 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, present argument and to otherwise fully participate in these proceedings.

DATED this 19<sup>th</sup> day of September, 2016



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Peter J. Richardson  
RICHARDSON ADAMS, PLLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 19th day of September, 2016, a true and correct copy of the within and foregoing PETITION TO INTERVENE BY THE INDUSTRIAL CUSTOMERS OF IDAHO POWER in Docket No. IPC-E-16-19 was served electronically and by HAND DELIVERY, to:

Julia Hilton  
Regulatory Dockets  
Idaho Power Company  
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Jean Jewell  
Commission Secretary  
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Kandi Walters  
Administrative Assistant