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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)	CASE NO. IPC-E-16-07
AUTHORITY TO TRANSFER TITLE OF)	PETITION TO INTERVENE
MOBIL MANOR MOBILE HOME PARK)	OF THE INDUSTRIAL CUSTOMERS
METER PEDESTALS..)	OF IDAHO POWER
)	
)	
)	
)	
)	

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 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
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515 N. 27th St
P.O. Box 7218
Boise, Idaho 83702
Telephone: (208) 938-7901
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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

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 proceeding in that its members are interested in, and directly impacted by, the administration and application of Idaho Power’s rules, policies and practices as they impact the sale, disposal, operation, maintenance and cost of Idaho Power owned facilities beyond the point of delivery. In addition, the ICIP members are interested in the potential discriminatory impact of the sale, disposal, operation, maintenance and cost of Idaho Power owned facilities beyond the point of delivery that are not governed by the administration of Rule M versus those that are governed by the administration of Rule M.

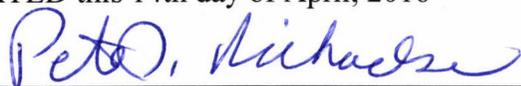
3. This Intervenor, in its capacity as a representative of industrial customers intends to participate herein as a party, and if necessary, to introduce evidence, cross-examine witnesses, call and examine witnesses, and be heard in argument. The nature and quality of evidence which this Intervenor will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

5. 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.

6. 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 14th day of April, 2016



Peter J. Richardson
RICHARDSON ADAMS, PLLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 14th day of April, 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-16-07 was served electronically and by HAND DELIVERY, to:

Julia A. Hilton
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Nina Curtis
Administrative Assistant