

Big Wood Canal Company (“Big Wood”) is the owner of the Sagebrush Hydro Project and lessor to Wood Hydro. In meeting the requirements of the Public Utilities Regulatory Policy Act, Idaho Power Company and Big Wood have twice submitted contractual arrangements to the Staff for approval. The Staff objected to both arrangements. At the time, while Wood Hydro has previously submitted its own comments, it did not seek to intervene because of the protection of its financial interest by the Staff’s previous *Final Order No. 34677* and the parties’ agreement. Wood Hydro became aware of the vulnerability to its financial interest after the Staff’s most recent *Comments* on August 7, 2020.

Wood Hydro acknowledges this *Petition to Intervene* is being filed after the deadline established to intervene in this proceeding. However, as articulated above Wood Hydro’s financial interest became vulnerable very recently, and Petitioner files the *Petition to Intervene* without delay. Therefore, Wood Hydro’s delay in seeking intervention in this proceeding is reasonable, having believed Wood Hydro received all the relief desired when the case was initially closed after the final order. Wood Hydro will abide by the orders and notices entered prior to its intervention in this proceeding, in accordance with IDAPA 31.01.01.073. Wood Hydro’s intervention will not disrupt the proceeding, prejudice to existing parties, or undue broadening of the issues presented in this proceeding.

Wood Hydro intends to participate herein as a party, and if necessary or allowed, to introduce evidence, cross-examine witnesses, call and examine witnesses, and be heard in argument. The nature and quality of evidence with Wood Hydro will introduce is dependent upon the nature and effect of the other evidence in this proceeding.

DATED this 11th day of August 2020.

ARKOOSH LAW OFFICES

Amber Dresslar

Amber Dresslar
Attorney for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 11th day of August, 2020, I served a true and correct copy of the foregoing document(s) upon the following person(s), in the manner indicated:

Donovan E. Walker
Regulatory Dockets
Idaho Power Company
P.O. Box 70
Boise, ID 83707-0070
Email: dwalker@idahopower.com
dockets@idahopower.com

Energy Contracts
Idaho Power Company
P.O. Box 70
Boise, ID 83707-0070
Email: energycontracts@idahopower.com

David Stephenson
Big Wood Canal Co
409 N. Apple Street
Shoshone, ID 83352
Email: davidstephenson@cableone.net

John R. Hammon, Jr.
Deputy Attorney General
Idaho Public Utilities Commission
P.O. Box 83720
Boise, ID 83720-0074
Email: john.hammond@puc.idaho.gov



Amber Dresslar