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Attorneys for Complainant Black Mesa Energy, LLC

**BEFORE THE**  
**IDAHO PUBLIC UTILITIES COMMISSION**

BLACK MESA ENERGY, LLC, Complainant,	)	Case No. IPC-E-20-17
vs.	)	
IDAHO POWER COMPANY, Defendant.	)	MOTION TO EXTEND TIME

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**INTRODUCTION**

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On March 17, 2020, Black Mesa Energy, LLC (“Black Mesa”) filed a formal complaint against the Idaho Power Company (“Idaho Power” or the “Company”) with the Idaho Public Utilities Commission (the “Commission” or “IPUC”) pursuant to Idaho Administrative Rule 31.01.01.054. On April 2, 2020, the Commission issued a summons to Idaho Power. On April 23, 2020, Idaho Power filed its Answer and Motion to Dismiss.

Pursuant to Idaho Administrative Rule 21.01.01.057.03, answers (or motions for additional time) to motions must be filed within fourteen days after the original motion is filed.

Given the complexity of the issues involved and the disruption to normal business operations due to the Governor’s quarantine orders, Black Mesa respectfully requests additional time in

1 which to lodge its answer to Idaho Power's Motion. Currently an answer is due on May 7, 2020.  
2 Black Mesa seeks just an additional eight days, until May 15, 2020, in which to lodge its answer.

3 Black Mesa has contacted counsel for Idaho Power and the Idaho PUC regarding its  
4 requested extension of time. Counsel for Idaho Power responded via telephone that the Power  
5 Company has no objection to an extension of time until May 15, 2020. Counsel for the Idaho  
6 PUC represented by email that "Staff would look at the reasons stated therein and the applicable  
7 Rules and determine whether it supports the motion."

8 Black Mesa represents that no party will be prejudiced by granting its motion for  
9 additional time and believes the Commission's interest in complete and thorough responses will  
10 be furthered by the same. In order to provide it with adequate time in which to reply to Idaho  
11 Power's Motion to Dismiss, Black Mesa therefore respectfully requests the Commission issue an  
12 order approving an extension of time for said reply not to be due until May 15, 2020.

Respectfully submitted this 28<sup>th</sup> day of April 2020,



Peter J. Richardson (ISB No. 3195)  
Richardson Adams, PLLC

### CERTIFICATE OF SERVICE

I HEREBY certify that I have on this 28<sup>th</sup> day of April, 2020, I served the foregoing MOTION TO EXTEND TIME OF BLACK MESA LLC, in Case IPC-E-20-17, by electronic mail to the following:

Diane Hanian  
Idaho PUC Secretary  
[Diane.hanian@puc.idaho.gov](mailto:Diane.hanian@puc.idaho.gov)

Edward Jewell, Deputy Attorney General  
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