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IDAHO PUBLIC UTILITIES COMMISSION

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Attorneys for IdaHydro

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF ROCKY
MOUNTAIN POWER FOR APPROVAL OF
A CAPACITY DEFICIENCY PERIOD TO
BE USED FOR AVOIDED COST
CALCULATIONS

) Case No. PAC-E-20-13

) **IDAHYDRO'S PETITION TO**
) **INTERVENE**

COMES NOW the Idaho Hydroelectric Power Producers Trust, an Idaho Trust, d/b/a IdaHydro ("IdaHydro"), by and through its counsel of record, C. Tom Arkoosh and Amber Dresslar of Arkoosh Law Offices, and pursuant to the Idaho Public Utilities Commission Rules of Procedure, IDAPA 31.01.01.071-073, 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 the intervenor is:

IdaHydro
c/o C. Tom Arkoosh
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802 W. Bannock Street, Suite LP 103
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Copies of all pleadings, production requests, production responses, Commission orders and other documents should be provided as noted above.

2. This Intervenor, IdaHydro is a confederacy of Idaho small hydroelectric producers joined in a trust for mutual benefit, consisting of approximately 100 MW of capacity produced by small hydroelectric plants. Some of its members' plants currently sell electric power and energy to PacifiCorp ("the Company") pursuant to multiple contracts and have the potential to sell additional electric power and energy at other possible cogeneration and small power production locations in Idaho. Therefore, IdaHydro claims a direct and substantial interest in this proceeding in that the prices it receives for electrical sales and costs it pays to the Company may be affected by the outcome of this proceeding.

3. IdaHydro 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 or via comments. 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 with limited means of participation in this proceeding, which may have a material impact on the prices it receives for electric sales and costs it pays to the Company.

WHEREFORE, IdaHydro 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 fully participate in these proceedings.

DATED this 16th day of November 2020. ARKOOSH LAW OFFICES



C. Tom Arkoosh
Attorney for IdaHydro

CERTIFICATE OF MAILING

I HEREBY CERTIFY that on the 16th day of November, I served a true and correct copy of the foregoing document(s) upon the following person(s), in the manner indicated:

Jan Noriyuki
Commission Secretary
Idaho Public Utilities Commission
472 W. Washington
Boise, ID 83702

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C. Tom Arkoosh