

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

Docket No. UE 426

In the Matter of)	
)	
IDAHO POWER COMPANY'S)	PETITION TO INTERVENE
)	of the
Request for a General Rate Revision.))	J. R. SIMPLOT COMPANY
_____)	

Pursuant to Oregon Revised Statutes §756.525 and Oregon Administrative Rules §860-001-0300, the J. R. Simplot Company ("Simplot") hereby petitions to intervene in this proceeding with full party status as described in Oregon Administrative Rules §860-001-0010(7). In support hereof, Simplot says as follows:

1. The Contact information for Simplot is:

Dru Nakaya
J. R. Simplot Company
1099 Front Street
Boise, Idaho 83702
dru.nakaya@simplot.com
(208)780-7276

Please include Mr. Nakaya on the service list in this matter.

2. Simplot will be represented herein by:

Peter J. Richardson
Richardson Adams, PLLC
515 N. 27th Street
Boise, Idaho 83702
peter@richardsonadams.com
(208) 938-7901

3. Simplot has a direct and substantial interest in this matter. It owns and operates a large food processing plant (and associated ancillary facilities) in Ontario, Oregon. Simplot

takes Large Power Service from Idaho Power Company, an electric utility monopoly that is subject to rate and terms-of-service regulation by the Public Utility Commission of Oregon. The rates and the terms of service under which Simplot operates in Oregon are subject to possible revision in this proceeding.

4. Simplot intends to address issues that are related to the possible revision of its electric rates and terms-of-service in the State of Oregon.

5. Simplot possesses unique and special knowledge, expertise and insight as a Large Power Service customer that is provided monopoly electric service by Idaho Power in Oregon (as well as in Idaho). Simplot is one of the power company's largest customers both in terms of the volume of electricity consumed and in terms of revenue to the power company. Simplot has experience as an active participant in electric utility rate cases such as the instant proceeding.

6. Based on the forgoing and in accord with the Commission's rules of procedure, the J. R. Simplot Company respectfully requests it be granted status as an intervenor/party with all rights appurtenant thereto.

7. Simplot's participation as an intervenor/party will not unduly broaden the issues or burden the record, nor will it unreasonably delay this proceeding.

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Dated this 2nd day of January 2024, by:



PETER J. RICHARDSON OSB #066687

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Attorneys for the J. R. Simplot Company