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RECEIVED
July 07, 2025
IDAHO PUBLIC
UTILITIES COMMISSION

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER	)	CASE NO. IPC E-25-16
COMPANY'S APPLICATION FOR	)	
GENERAL RATE CASE	)	MOTION TO INTERVENE
	)	
_____	)	

INTERVENORS John Gannon, Deborah Fease, Amy Lorrance and Randy Morris make this motion to intervene in the above entitled case before this Commission pursuant to Idaho Public Utilities Commission rules 31.01.01.17, 31.01.01.71, 31.01.01.72, 31.01.01.73, 31.01.01.74. Intervenors are concerned that there is no public group that is participating in this proceeding and we want to make sure that public issues are considered in connection with this historic significant residential increase of 17% which if allowed, would follow two recent residential increases.

I. OUR CONCERNS

***1. WHO SHOULD PAY FOR THE GENERATION COSTS OF
IDAHO POWERS FORCASTED 60% IN NEW POWER NEEDS***

The application appears to include a massive rate shift of cost to residential customers and farmers, which cost appears likely to increase in the future, and appears necessary to begin financing a 60% increase in Idaho Power sales over the next 5-8 years. Idaho Power does need to generate more electricity if sales increase 60%. (Exhibit 1) However, the issue is are residential

customers creating this tremendous sudden spike in demand or are other entities causing this? If homes and farm are not creating this this spike in demand should those creating the demand bear the costs of the new power generation.

2. HOW MUCH OF THE SPIKE IN DEMAND IS CAUSED BY THE ELECTRIC EATING DATA CENTERS THAT ARE PROPOSED

It does appear that a significant spike in demand is because of data centers that eat electricity 24 hours a day and use the electricity equivalent of hundreds of thousands of homes. A recent Harvard Law analysis found consumer rates will double because of AI and Data Centers. (Exhibit 2). Idaho Power says that 1MW powers 650 homes. (Exhibit 3) The Diode company is pursuing a 600-800 megawatt (MW) facility in Kuna according to a presentation at the Kuna City Council. Thus, $700\text{MW} \times 650 = 455,000$ homes on an average day. On a hot day $700\text{MW} \times 300$ homes = 210,000 homes. We note that the Northwest Power and Conservation Council uses 796.36 homes for each 1 MW. (Exhibit 3) Diode is a separate development from the Meta data center which will use an undisclosed amount, but probably at least 200MW which may be the smallest size that we could locate for a Meta center. Meanwhile Micron needs at least 512MW for its facility and it will need an amount for the second Fab it has just announced.

3. SINCE IDAHO POWER TODAY PROVIDES AROUND 3500 MW TO SERVE ALL CUSTOMERS, A POTENTIAL 1500 MW INCREASE PLUS A SECOND MICRON FAB COULD BE HUGE. WHERE WILL THIS ELECTRICITY COME FROM AND AT WHAT COST TO RESIDENTIAL RATEPAYERS?

There has been an Idaho Power goal of ending fossil fuel dependency which might be aligned with residential interests. These participants would like to be involved in these proceedings to ascertain the exact reasons for the rate increase requests.

4. HOW MUCH IS THE REQUESTED INCREASE

On June 1, 2025, the Commission approved a Power Cost Adjustment (PCA) of \$92.5 million, but the Application uses a figure of \$46.5 million. We are not clear if a PCA that is more than 46.5 million would still be credited in future spring reviews, or if there are no more PCA credits period. It does appear that a PCA loss like the one that occurred in 2022 could still be charged to ratepayers and raise rates. This is a concern but one which could change as the PCA proposal is clarified.

5. DOES THIS RATE INCREASE ON TOP OF PREVIOUS INCREASES ALIGN WITH IDAHO POWERS GOAL OF KEEPING RATES IN IDAHO LOW?

The Idaho Power Integrated Resource Plan for 2025 was scheduled to be issued in June, 2025, and perhaps goals and predictions have changed. In any event, the Idaho Power Integrated Resource Plan (2023) quotes the 2022 Idaho Energy Landscape Report conclusion that “The strength of Idaho’s economy and quality of life for its citizens depend upon access to affordable and reliable energy resources.” (IRP 2023, P 25). The IRP summarizes the 2022 Idaho Energy Landscape Report as “low-cost hydroelectricity helps preserve Idaho’s low electricity rates and is the cornerstone of Idaho Power’s low electricity rates. As the largest utility in the state, Idaho Power’s total retail average rate was 32% below the national average in 2022, based on data compiled by the Edison Electric Institute”. (Exhibit 4)

6. WILL THE PROPOSED INCREASE THAT SPENDS MONEY ON TRANSMISSION HELP KEEP IDAHO RATES LOW OR CAUSE IDAHO RATES TO HAVE TO COMPETE WITH OTHER STATES HIGHER RATES

It appears from the Application that \$53 million of the \$199 million is for transmission

and back up facilities. Having more access to the grid does make power available, but at what cost and does it at the same time make our Idaho power generation available for others. Exhibit 6 is the Federal Department of Energy cost comparisons Compare:

Idaho	10.82 cents per KWH Residential
Oregon	14.44 cents per KWH Residential
California	30.22 cents per KWH Residential

Will adding transmission lines to the grid allow excess Idaho electricity to be sold at a higher rate and will that stimulate higher prices in Idaho, or not?

II. INTERVENORS HAVE STANDING

Three intervenors are Idaho Power customers and have been for many years. One pays for electricity through his rent. John Gannon is an attorney serving in the Idaho Legislature who has become familiar with electricity issues as floor co-sponsor of House Bills 315 (with data center sales taxes), 395 (the Fair Rate bill), 415 (PUC management of energy facilities that serve out of state needs). Gannon represented intervenors in 2003 where he represented Quest (Century Link) customers regarding deregulating phone rates, which the commission declined to do. In 2023, Gannon and other Boise Bench residents intervened in Veolia's rate increase request and Veolia committed to repair the Taggart Street well and delivery systems.

Deborah Fease has had a career as a construction engineer and has knowledge about electrical issues and the costs and actions associated with their inclusion in a project.

Randy Morris has a long history of involvement in environmental issues and was a long term officer of the Committee for Idaho's High Desert and has advocated for the proper sustainable use and management of our public lands and their resources.

Amy Lorraine is a residential ratepayer.

III INTERVENORS INTENTIONS

Intervenors intend to participate in the proceedings, ask questions of witnesses, and submit pertinent and relevant witness testimony as needed. Intervenors will have to determine the evidence needed as this case proceeds.

It is likely that as this matter proceeds these intervenors may modify their intervention by forming and asking for inclusion of a formal organization and identifying an individual as legal counsel.

These Intervenors respectfully requests that this Commission grant this Petition to Intervene and issue a timely order allowing Petitioners to intervene.
as set forth in IDAPA 31. 01. 01. 075.

DATED this 7th day of July, 2025

By

John Gannon

By

Deborah Fease

By

Randy Morris

By

Amy Lorraine

Commission Secretary U.S. Mail Idaho Public Utilities Commission Personal Delivery 11331 W.
Chinden Blvd., Ste. 201- A Facsimile Boise, ID 83714 Electronic secretar] 2uc. idaho. gov

System Sales Forecast Results

Annual System Energy Sales (GWh)

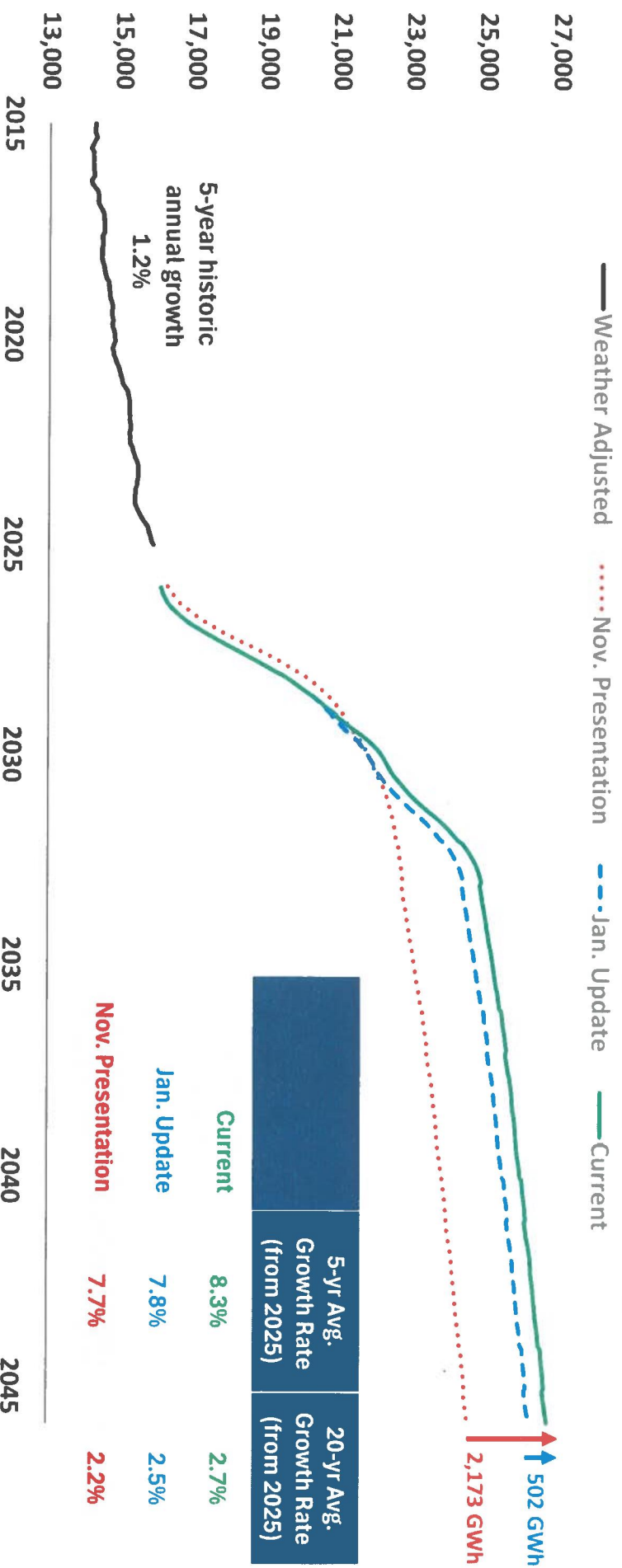


Exhibit 1



BIZ & LABOR

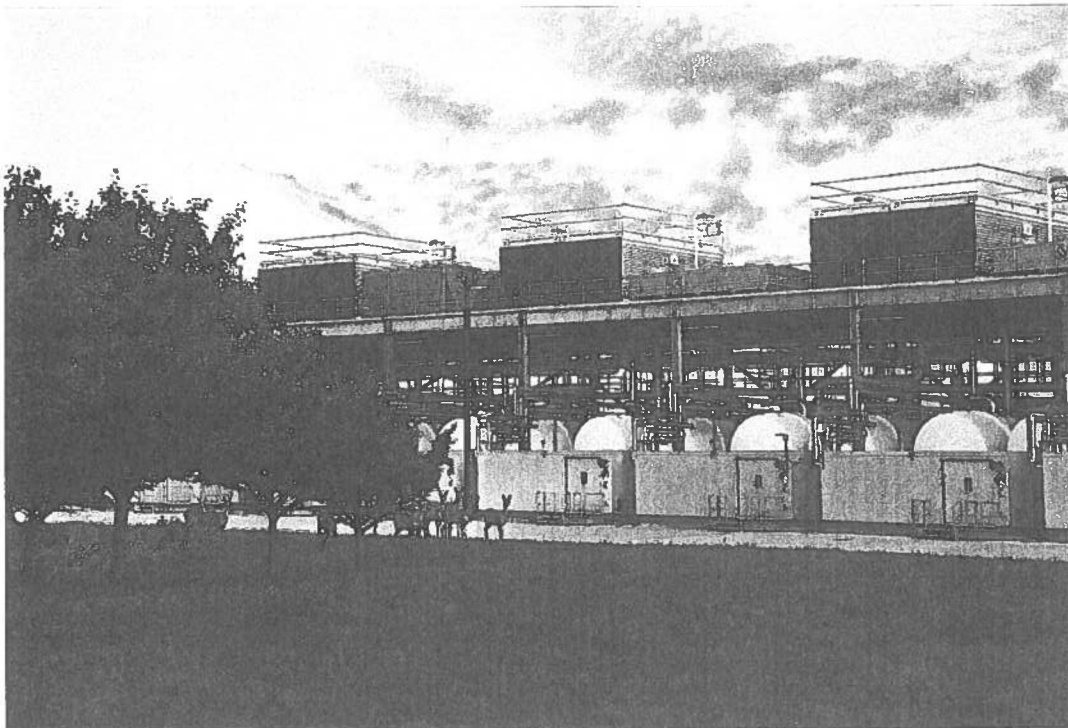
ENERGY & ENVIRONMENT

POLITICS & GOV

Power for data centers could come at 'staggering' cost to consumers

New report highlights how traditional ways of setting rates don't fit Big Tech's massive, immediate demand for more electricity

BY: PAM RADTKE, FLOODLIGHT - MARCH 19, 2025 4:20 AM



Deer are seen outside of a Google data center in Council Bluffs, Iowa. (Google Data Centers)

This article was originally published by Floodlight.

The explosive growth of data centers around the country – driven in large part by the burgeoning use of artificial intelligence – could come at a “staggering” cost for average residents with skyrocketing electricity bills.

A new report from Harvard's Electricity Law Initiative says unless something changes, all U.S. consumers will pay billions of dollars to build new power plants to serve Big Tech.

Exhibit 2

Data centers are forecast to account for up to 12% of all U.S. electricity demand by 2028. They currently use about 4% of all electricity.

Historically, costs for new power plants, powerlines and other infrastructure are paid for by all customers under the belief that everyone benefits from those investments.

“But the staggering power demands of data centers defy this assumption,” the report argues.

“We’re all paying for the energy costs of the world’s wealthiest corporations,” said report author Ari Peskoe, director of the initiative at the Harvard Law School Environmental and Energy Law Program. He worked with co-author Eliza Martin to produce the report, “Extracting Profits from the Public: How Utility Ratepayers are Paying for Big Tech’s Power.”

Lucas Fykes, director of energy policy for The Data Center Coalition, which advocates for the industry, responded to Floodlight by email, saying, “State utility commissions have the regulatory responsibility and authority, expertise, experience and processes in place to ensure that cost allocation and rate design are fair and reasonable for all customers.”

A spokesperson for Dominion, which serves one of the nation’s largest data center loads in Virginia, said establishing rates in the state is an “open and transparent” process.

Aaron Mitchell, vice president of pricing and planning at Georgia Power, testified to a Georgia legislative committee that adding 3,300 megawatts (MW) of new generation for data centers –or enough to power roughly three million homes – will actually reduce customers’ bills.

“The more that we are able to serve, the more that we can provide benefits to existing customers, by virtue of those new customers coming online and paying their fair share of the costs that we incur to serve those customers,” Mitchell said.

Power Terms

- **Voltage** (kilovolts [kV])—The pressure that moves a current of electricity. One kV equals 1,000 volts.
- **Power** (megawatts [MW])—The rate at which work is performed. One MW equals 1,000,000 watts.
- ✓ One MW can power 650 homes on an average day, but only about 300 homes on a peak day, which occurs in the heat of the summer.
- One MW can power one to two large box stores
- **Energy** (kilowatt-hours [kWh])—The amount of power used over time. A 100-watt light bulb on for 10 hours will consume this much energy:

$$\text{Energy} = 100 \text{ W} \times 10 \text{ hours} = 1,000 \text{ Wh} = 1 \text{ kWh}$$

- **Capacity** (MW) —The maximum amount of power an element of the power system can handle or produce. For example, in a freeway analogy, capacity is represented by the number of cars that can cross a line on a freeway at the same time, while energy is represented by the number of vehicles that cross the line over time. Capacity constraints can be alleviated by the following:
 - Decreasing the power required during peak hours (demand response)
 - Decreasing the power required with energy efficiency measures
 - Adding transmission lines, substations, and generators
- **Peak demand** (MW)—The amount of power used during a peak day in summer or winter.

Unit Summary Table

	Base Unit	Typical Unit
Voltage	Volt (V)	kilovolt (kV)*
Power	Watt (W)	megawatt (MW)**
Capacity	Watt (W)	megawatt (MW)**
Energy	Watt-hours (Wh)	kilowatt-hours (kWh)

*kilo = 1,000

**mega = 1,000,000

THE FOLLOWING IS THE NORTHWEST POWER AND
CONSERVATION COUNCIL STATEMENT REGARDING
MEGAWATT USAGE

THE COUNCIL ~~ST~~ATES ON ITS PERTINENT PAGE (UNDERLINED) THAT ONE
MEGAWATT IS ENOUGH TO POWER 796.36 HOMES FOR A YEAR.

I HAVE BEEN USING IDAHO POWERS 650 HOMES WHEN I CALCULATE MEGAWATT
USAGE, A MORE CONSERVATIVE ESTIMATE. HOWEVER, THIS COUNCIL IS VERY
RESPECTED AND A CALCULATION WOULD MAKE AN 700 MEGAWATT DATA CENTER EVEN
MORE IMPACTFUL.

E

Megawatt

Northwest Power and Conservation Council

Megawatt is the standard term of measurement for bulk electricity. One megawatt is 1 million watts. One million watts delivered continuously 24 hours a day for a year (8,760 hours) is called an average megawatt.

The distinction between megawatts and average megawatts is important. The total possible output of a generating plant is expressed in megawatts. This is called the plant's generating capacity. It's like a horsepower rating – how much a generating plant is designed to produce at full load. The maximum amount of power a generating plant is capable of producing over the course of an average year is called its generating capability or average annual energy, expressed in average megawatts.

Northwest capacity and energy for the various types of generation that make up the regional power supply are shown in pie charts on the Power Supply page of the Council's website.

The difference between capacity (megawatts) and energy (average megawatts) can be dramatic. For example, the capacity of Grand Coulee Dam, the largest in the Columbia River Basin and one of the largest in the world, is 6,595 megawatts but its average annual energy is 2,732 average megawatts.

✓ As of 2017, the average residential electricity customer in the Northwest uses about 11 megawatt-hours per year. At 11 megawatt-hours per year per average household, on a regional basis, one average megawatt is enough to power 796.36 Northwest homes for a year. To use Grand Coulee Dam again as an example, its average annual energy would be enough to power 2,175,655 homes (if it only powered homes).

That's a regional average. Electricity use varies from customer to customer and utility to utility. For example, all-electric homes consume more electricity than homes that use natural gas for furnaces, ovens, and water heaters.

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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER	)	CASE NO. IPC E-25-16
COMPANY'S APPLICATION FOR	)	NOTICE OF SERVICE
GENERAL RATE CASE	)	PARTIES ADDRESS
	)	FOR SERVICE FOR
	)	MOTION TO INTERVENE
	)	
	)	

COMES NOW INTERVENORS John Gannon who hereby give notice that the Motion to Intervene has been filed and served July 7, 2025 via electronic service upon the following parties:

Secretary@PUC.idaho.gov.

and along with this Notice of Service served upon the following parties July 8 2025 via electronic service:

Idaho Power:
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awjensen@hollandhart.com

Federal Executive Agencies

GANNON, FEASE, LORRANCE MORRIS NOTICE OF SERVICE AND ADDRESS
DESIGNATIONS

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Service of all documents and pleadings upon these parties may be made upon:

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Randy Morris
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Deborah Fease and Amy Lorrance
feased854@gmail.com

Dated this 8th day of July, 2025

By____/s/John Gannon_____
John Gannon