

Benjamin J. Otto (ISB No. 8292)  
710 N 6<sup>th</sup> Street  
Boise, ID 83701  
Ph: (208) 345-6933 x 12  
Fax: (208) 344-0344  
botto@idahoconservation.org

Attorney for the Idaho Conservation League

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

<b>IN THE MATTER OF THE</b>	)	
<b>APPLICATION OF IDAHO POWER</b>	)	<b>CASE NO. IPC-E-20-15</b>
<b>COMPANY FOR A DETERMINATION</b>	)	
<b>OF 2019 DEMAND-SIDE</b>	)	<b>PETITION TO INTERVENE OF THE</b>
<b>MANAGEMENT EXPENSES AS</b>	)	<b>IDAHO CONSERVATION LEAGUE</b>
<b>PRUDENTLY INCURRED.</b>	)	

COMES NOW the Idaho Conservation League (“ICL”) and hereby requests leave to intervene in the above captioned matter pursuant to the Idaho Public Utilities Commission Rules of Procedure, IDAPA 31.01.01.071-073. As discussed below, ICL has direct and substantial interests in these proceedings, and therefore should be granted intervention.

1. The name of this intervenor is:

Benjamin J. Otto  
Idaho Conservation League  
710 N. 6<sup>th</sup> st.  
Boise, Idaho 83702  
Ph: (208) 345-6933 x 12  
Fax: (208) 344-0344  
botto@idahoconservation.org

Please provide copies of all pleadings, production requests, production responses, Commission orders, and other documents to the name and address above. In the interest of conserving natural resources and reducing the costs to all parties, please provide hard copies of pleadings, testimony, and briefs only. Production requests, responses, notices, Commission orders, and other filings may be submitted via electronic mail in accordance with IPUC Rules 31.01.01.063.02-03.

2. Idaho Conservation League claims a direct and substantial interest in this proceeding arising from the impact to its members served by Idaho Power and to its long-term role

advocating for public values. As Idaho's largest state-based conservation organization, we have approximately 11,000 members most of whom are residential customers of Idaho Power. ICL, as an organization, is a Schedule 9 customer in our Boise office and Schedule 7 customer in our Ketchum office. On behalf of our members, ICL has consistently engaged with Idaho Power and other stakeholders to shape the Company's Demand Side Management programs in order to protect the interests of ensuring affordable energy bills and the continued pursuit of all cost-effective energy conservation. Because this Commission has directed all utilities to pursue all cost-effective energy conservation measures, ICL's intervention will not unduly broaden the issues in this proceeding.

3. ICL intends to fully participate in this matter as a party. The nature and quality of ICL's intervention in the proceeding is dependant upon the nature and effect of other evidence in this proceeding. If necessary ICL may introduce evidence, be heard in argument, and call, examine, and cross-examine witnesses. ICL intends to seek intervenor funding pursuant to IDAPA 31.01.01.161-165.

WHEREFORE, ICL respectfully requests the Commission grant this petition.

Respectfully submitted this 23rd day of April 2020.

          /s/ Benjamin J. Otto            
Benjamin J. Otto  
Idaho Conservation League

## CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of April, 2020, I delivered true and correct copies of the foregoing PETITION TO INTERVENE to the following persons via the method of service noted:

/s/ Benjamin J. Otto

Electronic mail only (See Order 34602):

*Idaho Public Utilities Commission*

Diane Hanian, Secretary  
secretary@puc.idaho.gov

*Idaho Power*

Lisa D. Nordstrom  
Connie Aschenbrenner  
lnordstrom@idahopower.com  
caschenbrenner@idahopower.com  
dockets@idahopower.com

*Industrial Customers of Idaho Power*

Peter J. Richardson, Richardson Adams PLLC  
peter@richardsonadams.com

Dr. Don Reading  
dreading@mindspring.com

*Idaho Irrigation Pumpers Association*

Lynn Tominaga  
Eric L. Olsen, Echohawk & Olsen PLLC  
elo@echohawk.com

Tony Yankle  
tony@yankle.com