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IDAHO PUBLIC
UTILITIES COMMISSION

Attorney for the Idaho Conservation League

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

**IN THE MATTER OF THE)
APPLICATION OF IDAHO POWER) CASE NO. IPC-E-20-33
COMPANY FOR AUTHORITY TO)
REVISE THE ENERGY) PETITION TO INTERVENE OF THE
EFFICIENCY RIDER, TARIFF) IDAHO CONSERVATION LEAGUE
SCHEDULE 91)**

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
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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 as an Idaho Power customer and on behalf of our members served by Idaho Power. 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. ICL brings a unique and valuable perspective to this issue due to our long-term engagement with Idaho Power and other stakeholders to ensure adequate funding to pursue all cost effective energy conservation. ICL's intervention will not unduly broaden the issues in this proceeding, other than connecting this docket to Idaho Power's request to reduce rates connected to the Boardman plant closure as the Company proposes in IPC-E-20-32.

3. ICL intends to fully participate in this matter as a party. The nature and quality of ICL's intervention in the proceeding is dependent 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 17th day of September 2020.

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

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of September, 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

Jan Noriyuki, Secretary

Jan.noriyuki@puc.idaho.gov

Idaho Power

Lisa D. Nordstrom

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