

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

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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 ROCKY MOUNTAIN)	
POWER TO CLOSE THE NET)	CASE NO. PAC-E-19-08
METERING PROGRAM TO NEW)	
SERVICE & IMPLEMENT A NET)	
BILLING PROGRAM TO)	PETITION TO INTERVENE OF THE
COMPENSATE CUSTOMER)	IDAHO CONSERVATION LEAGUE
GENERATORS FOR EXPORTED)	
GENERATION)	

The Idaho Conservation League (“ICL”) hereby petitions 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. 6th 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. The Idaho Conservation League has a direct and substantial interest in this matter due to our longstanding engagement in Idaho electricity regulation and our approximately 20 current, dues-paying members who are residential customers of Rocky Mountain Power. On

behalf of our Rocky Mountain Power-served members, ICL claims a direct and substantial interest in this proceeding arising from the potential impact to current and future owners of distributed energy systems. ICL will be responding to RMP's proposal and thus our intervention here will not unduly broaden the issues raised by RMP's application.

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 may seek intervenor funding pursuant to IDAPA 31.01.01.161-165.

WHEREFORE, ICL respectfully requests the Commission grant this petition.

DATED this 17th day of July 2019.

Respectfully submitted,


Benjamin J. Otto
Idaho Conservation League

CERTIFICATE OF SERVICE

I certify that on the 17th day of July 2019, I delivered true and correct copies of the foregoing PETITION TO INTERVENE to the following via the service method noted:

Hand delivery:

Diane Hanian
Commission Secretary (Original and 7
copies)
Idaho Public Utilities Commission
427 W. Washington St.
Boise, ID 83702-5983

Idaho Irrigation Pumpers Association
Eric L. Olsen
ECHO HAWK & OLSEN, PLLC
505 Pershing Ave., Ste.100
Pocatello, Idaho 83205
elo@echohawk.com

Electronic Mail only:
Rocky Mountain Power
Yvonne R. Hogle
Ted Weston
Rocky Mountain Power
1407 West North Temple, Suite 320
Salt Lake City, Utah 84116
yvonne.hogle@pacificorp.com
ted.weston@pacificorp.com
datarequest@pacificorp.com

Anthony Yankel
12700 Lake Avenue, Unit 2505
Lakewood, Ohio 44107
tony@yankel.net


Benjamin J. Otto
Idaho Conservation League