



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 Avista and to its long-term role advocating for public values. As Idaho's largest state-based conservation organization, we have approximately 1,000 members who are residential customers of Avista in Idaho. In addition to representing the interest of residential customers, ICL has an interest in expanding energy efficiency and conservation in Idaho. As the only potential intervenor in this proceeding advocating for investments, rate designs, and rate spreads specifically intended to fully incentivize energy efficiency and conservation, ICL brings a unique and valuable perspective to this proceeding. Because this Commission has directed all utilities to pursue all cost effective efficiency and 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.

DATED this 22nd day of July 2011

Respectfully submitted,



Benjamin J. Otto

On behalf of the Idaho Conservation League

**CERTIFICATE OF SERVICE**

I hereby certify that on this 22nd day of July 2011, I delivered true and correct copies of the foregoing PETITION TO INTERVENE to the following persons via the method of service noted:

Hand delivery:

Jean Jewell  
Commission Secretary (Original and seven copies provided)  
Idaho Public Utilities Commission  
427 W. Washington St.  
Boise, ID 83702-5983

Electronic Mail:

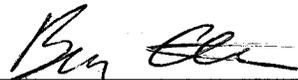
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