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Community Action Partnership
Association of Idaho

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IDAHO PUBLIC COMMISSION

## BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION (CASE NO. AVU-E-17-01)
OF AVISTA CORPORATION DBA AVISTA (COMPORATION DBA AVISTA (COMPORATION DBA AVISTA (COMPORATION DELECTRIC AND NATURAL GAS SERVICE (COMPORATION DELECTRIC AND NA

COMES NOW, the Community Action Partnership Association of Idaho (hereinafter "CAPAI" or "Intervenor"), by and through its attorney of record Brad M. Purdy and, pursuant to Rules 071-076 of the Commission's Rules of Practice and Procedure, IDAPA 31.01.01.071-076, hereby petitions the Commission for leave to intervene in this proceeding and to appear and participate with full party's rights. In support of this Petition, CAPAI states as follows:

1. The name and address of the Petitioner is:

Community Action Partnership Association of Idaho 5400 W. Franklin Rd., Suite G Boise, ID. 83705

 CAPAI will be represented in this proceeding by, and pleadings and other correspondence need only be sent to:

> Brad M. Purdy Attorney at Law 2019 N. 17<sup>th</sup> St. Boise, ID. 83702 208-384-1299

Email: <u>bmpurdy@hotmail.com</u>

3. CAPAI is a non-profit corporation consisting of six community action agencies, and two special purpose agencies, serving every county in Idaho and fights the causes and conditions of poverty through building the capacity and effectiveness of its members who have a direct and substantial interest in this proceeding. These causes and conditions of poverty are numerous, disparate and include increasing utility rates such as those for AVISTA Corporation's low income rate payers.

Low income families pay a higher percentage of their income for utility expenses than those in other economic categories. CAPAI is typically the only party who intervenes in proceedings before the Commission specifically representing regulated public utilities' low income customers. CAPAI has been a regular intervenor in proceedings before the Commission for roughly fifteen years. Pertinent to this case, CAPAI has been involved in a considerable number of AVISTA proceedings before this Commission. CAPAI's staff works with Avista on a regular basis for many reasons including implementation and auditing of the Company's low-income weatherization and other low income programs. Because of the increasing number of utility customers who qualify under federal guidelines as living below the federal poverty level, CAPAI contends that the continued existence and viability of these customers is essential to the

general body of ratepayers. Thus, if granted intervention in this case, CAPAI will address a variety of issues of importance to the general body of ratepayers.

CAPAI believes that it would fulfill an important role in this proceeding if given the opportunity to participate as a party. Consequently, CAPAI asserts that it has a direct and substantial interest in the subject matter of this proceeding and that its intervention will not unduly broaden the issues presented by AVISTA's Application.

Based on the foregoing, CAPAI asserts that it has a direct and substantial interest in this case. Furthermore, if granted intervention, CAPAI would fulfill an important role in this proceeding by helping to inform the Commission's decision-making regarding Avista's most vulnerable customers.

4. CAPAI respectfully requests the right to participate in this proceeding and introduce testimony and exhibits, cross-examine other witnesses, engage in oral argument, file comments, and otherwise fully participate as a party.

WHEREFORE, the Community Action Partnership Association of Idaho hereby requests that this Commission grant its Petition to Intervene in this proceeding and to fully appear and participate as a party with all the rights and responsibilities as such.

DATED, this 13th day of July, 2017.

Brad M. Purdy

## **CERTIFICATE OF SERVICE**

I, the undersigned, hereby represent that on this 13<sup>th</sup> day of July, 2017, I caused a true and correct copy of this Petition to Intervene to be served on the following via U.S. Mail, First Class, Postage Prepaid.

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peter@richardsonadams.com

DATED, this 13th day of July, 2017

Brad M. Purdy