Matthew A. Nykiel (ISB No. 10270) P.O. Box 2308 102 S. Euclid #207 Sandpoint, ID 83864 Ph: (208) 265-9565 Fax: (208) 265-9650 mnykiel@idahoconservation.org RECEIVED

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IDAHO PUBLIC
LITTLE THES COMMISSION

Attorney for the Idaho Conservation League

## BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION	)	CASE NO. AVU-E-17-01
OF AVISTA CORPORATION DBA AVISTA	)	AVU-G-17-01
UTILITIES FOR AUTHORITY TO	)	
INCREASE ITS RATES AND CHARGES	)	PETITION TO INTERVENE OF
FOR ELECTRIC AND NATURAL GAS	)	IDAHO CONSERVATION LEAGUE
SERVICE NOTICE OF APPLICATION IN	)	
IDAHO	)	

The Idaho Conservation League ("ICL") petitions the Commission to intervene in this matter on behalf of itself and its members who are customers of Avista Utilities ("Avista") 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:

Matthew A. Nykiel Idaho Conservation League P.O. Box 2308 102 S. Euclid #207 Sandpoint, ID 83864 Ph: (208) 265-9565 Fax: (208) 265-9650 mnykiel@idahoconservation.org

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

2. ICL's direct and substantial interest in this proceeding arises from the impact to our members served by Avista and our 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 and who will be impacted by the outcome of this proceeding. In addition to representing the interest of residential customers, ICL has an interest in promoting the responsible expansion of energy efficiency and renewable energy in Idaho. We do this by advocating for investments, policies, and rate designs specifically intended to fully incentivize energy efficiency

and conservation. Because this Commission has directed Idaho utilities to pursue all cost effective energy efficiency and conservation measures, ICL's intervention will provide a valuable perspective and 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 dependent on the nature and effect of other evidence in this proceeding. ICL has not fully determined the specific positions it will take or the relief it will seek. ICL seeks to intervene for purposes of protecting its interests as they arise. ICL may seek intervenor funding pursuant to IDAPA 31.01.01.161-165.

WHEREFORE, ICL respectfully requests the Commission grant this petition.

DATED this 11th day of July 2017

Respectfully submitted,

Matthew A. Nykiel

Idaho Conservation League

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## CERTIFICATE OF SERVICE

I hereby certify that on this 11<sup>th</sup> day of July, 2017, I delivered true and correct copies of the foregoing PETITION TO INTERVENE OF IDAHO CONSERVATION LEAGUE to the following person via the method of service noted:

## FedEx:

Diane Hanian
Commission Secretary
Idaho Public Utilities Commission
427 W. Washington St.
Boise, ID 83702-5983
diane.holt@puc.idaho.gov
(Original and seven copies provided)

## Electronic Mail:

David J. Meyer Avista Corporation P.O. Box 3727 1411 East Mission Avenue Spokane, WA 99220-3727 david.meyer@avistacorp.com

Peter J. Richardson Richardson Adams, PLLC 515 N. 27<sup>th</sup> Street P.O. Box 7218 Boise, ID 83702 peter@richardsonadams.com

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Dr. Don Reading 6070 Hill Road Boise, ID 83703 dreading@mindspring.com

Travis Ritchie Sierra Club 2101 Webster Street, Suite 1300 Oakland, CA 94612 travis.ritchie@sierraclub.org

Matthew A. Nykiel