

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 Intermountain Gas and to its long-term role advocating for public values. As Idaho's largest state-based conservation organization, we have approximately 11,000 members who are residential customers of Intermountain. ICL's Boise office is commercial customer of Intermountain Gas. As such, ICL and our members have a direct interest in this proceeding to ensure customer dollars are invested in cost-effective gas conservation programs that deliver verifiable and durable savings. ICL brings a unique and valuable perspective to this proceeding due to our long-standing engagement in utility sponsored conservation program including our participation in Intermountain's 2016 General Rate Case and as a member of Intermountain's Advisory Committee. Because this Commission has directed all utilities to pursue all cost-effective 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 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
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:

Electronic Mail (see Order 34781):

Idaho Public Utilities Commission
Jan Noriyuki, Commission Secretary
jan.noriyuki@puc.idaho.gov

Intermountain Gas Company
Lori A Blattner, Director – Regulatory Affairs
Lori.Blattner@intgas.com

Preston N. Carter, Givens Pursley LLP
prestoncarter@givenspursley.com
kendrah@givenspursley.com

/s/ Benjamin J Otto
Idaho Conservation League