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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)	
INVESTIGATION INTO THE IMPACT)	CASE NO. GNR-U-18-01
OF THE FEDERAL TAX CODE)	
REVISIONS ON UTILITY COSTS AND)	PETITION TO INTERVENE OF THE
RATEMAKING)	IDAHO CONSERVATION LEAGUE

The Idaho Conservation League (“ICL”) requests leave to intervene in the above captioned matter pursuant to the Idaho Public Utilities Commission Rules of Procedure, IDAPA 31.01.01.071-073. ICL acknowledges this Petition comes after the March 6th deadline to intervene established in Order No. 33991. As of March 6th, ICL did not see a direct and substantial interest in this investigation. On March 16th, ICL received a Notice filed by Avista at the Washington Utilities and Transportation Commission that parties to the Avista and Hydro One merger docket in Washington reached a settlement in principle that implicates federal tax issues. The day before this notice, on March 15 2018, the Idaho PUC Staff asked parties to the Avista and Hydro One merger docket in Idaho, including ICL, to reschedule the settlement conferences for this docket in Idaho. The combined impact of the notice filed in Washington and the rescheduling of the settlement conference in Idaho, leads ICL to claim a direct and substantial interest in this investigation into the impact to Avista of federal tax code changes regarding how this issue impacts our direct and substantial interest in the Avista and Hydro One merger docket. Because no party has filed any proposals or information regarding Avista, and because ICL agrees to be bound by any existing schedules, our late intervention will not prejudice other parties or delay the proceedings.

1. The name of this intervenor is:

Benjamin J. Otto
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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.

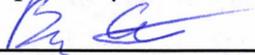
2. The Idaho Conservation League has a direct and substantial interest in this matter. ICL is a commercial customer of Avista in our Sandpoint, Idaho field office. ICL also has approximately 700 current, dues-paying members who are residential customers of Avista. On our own, and on behalf of our Avista-served members, ICL claims a direct and substantial interest in this proceeding arising from the potential for changes in the federal tax code to impact electric rates and services. We bring a unique and valuable perspective to this proceeding due to our interest in ensuring money collected for one public purposes, paying taxes, is used for another public purpose.

3. ICL's interest in the multi-utility docket is limited to Avista. ICL hereby waives service for all filings not relevant to Avista in the docket. Otherwise, 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 20th day of March 2017.

Respectfully submitted,



Benjamin J. Otto
Idaho Conservation League

CERTIFICATE OF SERVICE

I certify that on the 20th day of March, 2017, 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 seven copies provided)
Idaho Public Utilities Commission
427 W. Washington St.
Boise, ID 83702-5983

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