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IDAHO PUBLIC  
UTILITIES COMMISSION

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

**IN THE MATTER OF IDAHO POWER )      CASE NO. IPC-E-16-28**  
**COMPANY'S APPLICATION FOR )**  
**CERTIFICATE OF PUBLIC CONVENIENCE )**  
**AND NECESSITY FOR WOOD RIVER )**  
**VALLEY )**

**PETITION TO INTERVENE OF SIERRA CLUB**

Pursuant to IDAPA 31.01.01.042, Sierra Club hereby submits this petition to intervene in the above captioned matter.

1. Sierra Club is a national, non-profit environmental and conservation organization incorporated under the laws of the State of California, duly qualified to do business in the State of Idaho. Sierra Club has 2,400 members who live and purchase utility services in Idaho, many of those Sierra Club members are customers of Idaho Power who live in the Wood River Valley. Sierra Club's Idaho members have a direct and substantial interest in this proceeding.
2. Sierra Club's work includes advocating for the implementation of programs that assist its members and utility consumers generally to access renewable energy and increase energy efficiency. The Sierra Club's work includes intervening in dockets at public utility commissions nationwide, submitting comments in numerous state and federal agency energy-related proceedings and rule-makings, attending and speaking at public hearings, speaking to students and civic and other organizations, and holding seminars and symposia - all in support of policies to

reduce the impact of climate change and other air pollution by promoting clean energy alternatives and energy efficiency. Sierra Club members have worked tirelessly to promote clean energy alternatives and energy efficiency measures.

3. Sierra Club's Beyond Coal campaign seeks rapid replacement of fossil-fueled generating units with cleaner forms of energy to eliminate or reduce global climate change emissions, reduce utility bills, and generate renewable energy. Previous requests that Idaho Power fairly consider alternatives to building a redundant transmission line, including local renewable generation, are consistent with Sierra Club's Beyond Coal campaign goals.
4. Sierra Club's Ready for 100 campaign seeks to assist cities in transitioning to 100% clean energy. City of Ketchum goals for 2030 including 50% per capita energy reduction, 50% local renewable generation, 100% renewable power and a 75% reduction in GHG emissions are consistent with Sierra Club Ready for 100 goals.
5. Sierra Club has actively sought accurate and fair evaluation of the locational value of distributed energy resources as alternatives allowing the deferment of or as substitutes for adding transmission and distribution system resources. This docket raises those issues.
6. Sierra Club's participation as an intervenor in this proceeding will not unduly broaden the issues or delay the proceeding because Sierra Club's interest is directly related to the subjects addressed in Idaho Power's application. Sierra Club's involvement in this proceeding will not be duplicative of other parties in

this proceeding because no other party adequately represents Sierra Club's interests.

7. The name and address of the intervenor is:

Sierra Club  
c/o Zack Waterman  
Director, Idaho Sierra Club  
503 W Franklin St  
Boise, ID 83702  
Telephone: (208) 384-1023

8. Copies of all pleadings, production requests, production responses, Commission orders and other documents should be provided to Zack Waterman as noted above and to:

Michael Heckler  
3606 N Prospect Way  
Garden City, ID 83714  
Telephone: (208) 841-5667  
michael.p.heckler@gmail.com

WHEREFORE, Sierra Club respectfully requests that the Commission issue an order granting Sierra Club permission to intervene in this matter.

Dated this 20th day of December, 2016



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Zack Waterman  
Director, Idaho Sierra Club  
503 W Franklin St  
Boise, Idaho 83702

## CERTIFICATE OF SERVICE

I hereby certify that on the 20 day of December 2016, I caused to be served, via the method(s) indicated below, true and correct copies of the foregoing document, upon:

Jean Jewell, Secretary  
Idaho Public Utilities Commission  
472 West Washington Street  
P.O. Box 83720  
Boise, ID 83720-0074  
[Jean.jewell@puc.idaho.gov](mailto:Jean.jewell@puc.idaho.gov)

Hand Delivered	X
U.S. Mail	ف
Fax	ف
Fed. Express	ف
Email	ف

Donovan Walker  
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1221 West Idaho Street  
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[Dwalker@idahopower.com](mailto:Dwalker@idahopower.com)

Hand Delivered	ف
U.S. Mail	فX
Fax	ف
Fed. Express	ف
Email	X

BY: *Zack Waterman*  
Zack Waterman  
Director, Idaho Sierra Club