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27 September, 2016

IDAHO PUBLIC
UTILITIES COMMISSION

Ms. Jean Jewell
Secretary
Idaho Public Utilities Commission
472 W. Washington
Boise, ID 83702

RE: Case INT-G-16-02 Intermountain Gas Company's 2016 General Rate Case

Dear Ms. Jewell,

Enclosed, please find an original and seven (7) copies of Federal Executive Agencies' Petition to Intervene in the above reference proceeding.

Respectfully,



ANDREW J. UNSICKER, Maj, USAF
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Andrew.Unsicker@us.af.mil
Attorney for Federal Executive Agencies

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF)
INTERMOUNTAIN GAS COMPANY'S) Case Nos. INT-G-16-02
APPLICATION TO CHANGE ITS RATES AND)
CHARGES FOR NATURAL GAS SERVICE) FEDERAL EXECUTIVE AGENCIES'
IN THE STATE OF IDAHO) PETITION TO INTERVENE
)
)
_____)

Pursuant to Rules of Practice and Procedure of the Idaho Public Utilities Commission, Federal Executive Agencies, ("FEA"), through its undersigned counsel, files its Petition to Intervene in the above captioned case. In support thereof, FEA states as follows:

1. The FEA represents numerous federal entities within the area serviced by Intermountain Gas Company ("the Company"). Mountain Home Air Force Base represents a major customer of the Company.

2. The FEA notes that the filing of this Motion to Intervene is untimely, as the deadline to file intervention in this case was 23 September, 2016, pursuant to The Notice of Application Notice of Intervention Deadline, Order No. 33595, dated 9 September 2016. Pursuant to Rule 073 of the Commission's Rules of Practice and Procedure, FEA states that it has substantial reasons for the delay and that our filing is still greater than 14 days before the hearing or pre-hearing in this case. Additionally, FEA's late filing will not cause disruption, prejudice to existing parties, or undue broadening of the issues.

3. FEA was initially notified of the above-captioned case on 16 September 2016. The attorney's for the FEA often intervene in various state jurisdictions to represent FEA's interests across the country. Many times our attorneys are not licensed in those specific jurisdictions. Therefore, we must reach out to other attorneys within the air force to sponsor us *Pro Hac Vice*.

FEA was able to partner with the attorney in this case that sponsored us *Pro Hac Vice* on 22 September 2016. FEA had the Motion to Intervene drafted, as well as the Motion for Limited Admission *Pro Hac Vice* 23 September 2016. However, we were unable to secure the funding needed to cover the cost of the *Pro Hac Vice* motion on 23 September 2016. Obtaining necessary funding from the federal government can take some time, especially during the fiscal year close out, which is on 30 September 2016. Therefore, we wanted to ensure that the check had been made and sent to the Idaho State Bar at the time that our sponsoring attorney signed the Motion for Limited Admission *Pro Hac Vice*.

4. The FEA will be substantially affected by any order rendered by the Commission in this case. The Department of Defense has been delegated authority by the U.S. General Services Administration pursuant to section 205 (d) of the Federal Property and Administrative Services Act of 1949, as amended (40 U.S.C. 485(d)) to represent consumer interests of the executive agencies of the Federal Government.

5. Granting FEA intervention will not unduly broaden the issues presented by the application in this matter, and therefore, FEA is entitled to intervention pursuant to Rules 071-076 of the Commission's Rules of Practice and Procedure, IDAPA 31.01.01.071-076

WHEREFORE, FEA respectfully request that it be granted intervention in the above-referenced matter.

Please provide copies of all pleadings and address all communication with regard to this matter to:

Federal Executive Agencies
Andrew J. Unsicker
Lanny L. Zieman
Natalie A. Cepak
Thomas A. Jernigan
Ebony M. Payton

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RESPECTFULLY SUBMITTED THIS 27th day of September, 2016.



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Counsel for FEA

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy has been furnished by electronic mail

(e-mail) and/or U.S. Mail this 27th day of September, 2016 to the following:

<p>Idaho Public Utilities Commission Jean Jewell 472 W. Washington Street P.O. Box 83720 Boise, ID 83720 Jean.Jewell@puc.idaho.gov</p>	<p>Clearwater Paper Corporation C/o Peter Richardson, Esq. Richardson Adams PLLC 515 N. 27th Street P.O. Box 7218 Boise, ID 83702 Peter@richardsonadams.com</p>
<p>Northwest Industrial Gas Users Chad Stokes Tommy Brooks Cable Huston, LLP 1001 S. W. 5th, Suite 2000 Portland, OR 97204 CStokes@cablehuston.com Tbrooks@cablehuston.com</p>	<p>Givens Pursley LLP Michael Creamer 601 W. Bannock Street Boise, ID 83702 Mcc@givenspursley.com</p>
	<p>Federal Executive Agencies Andrew J. Unsicker Lanny L. Zieman Natalie A. Cepak Thomas A. Jernigan Ebony M. Payton AFLOA/JA-ULFSC 139 Barnes Drive, Suite 1 Tyndall AFB, FL 32403 (850) 283-6347 Andrew.Unsicker@us.af.mil Lanny.Zieman.1@us.af.mil Natalie.Cepak.2@us.af.mil Thomas.Jernigan.3@us.af.mil Ebony.Payton.ctr@us.af.mil</p>