

Benjamin J. Otto (ISB No. 8292)  
Matthew A. Nykiel (ISB No. 10270)  
710 N 6<sup>th</sup> Street  
Boise, ID 83701  
Ph: (208) 345-6933 x 12  
Fax: (208) 344-0344  
botto@idahoconservation.org  
mnykiel@idahoconservation.org

Attorneys for the Idaho Conservation League

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

<b>IN THE MATTER OF THE AVISTA'S</b>	)	<b>CASE NO. AVU-E-19-01</b>
<b>2020 ELECTRIC INTEGRATED</b>	)	
<b>RESOURCE PLAN</b>	)	<b>PETITION TO INTERVENE OF THE</b>
	)	<b>IDAHO CONSERVATION LEAGUE</b>

COMES NOW the Idaho Conservation League ("ICL") and hereby 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. 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:

Benjamin J. Otto  
Matthew A. Nykiel  
Idaho Conservation League  
710 N. 6<sup>th</sup> st.  
Boise, Idaho 83702  
Ph: (208) 345-6933 x 12  
Fax: (208) 344-0344  
botto@idahoconservation.org  
mnykiel@idahoconservation.org

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. Idaho Conservation League claims a direct and substantial interest in this proceeding arising from the impact to its members served by Avista and to ICL as an Avista customer. As Idaho's largest state-based conservation organization, we have approximately 1,000 members who are residential customers of Avista. ICL's Sandpoint, Idaho office is a small commercial

customer of Avista. As such, ICL and our members have a direct interest in this proceeding that addresses Avista's long-term plan for meeting energy needs in the least cost, least risk manner. The methods, assumptions, and data used in the planning process, and under review here, can have a substantial impact on the outcome of the Integrated Resource Plan, which lays a foundation for future utility actions that directly impact customers. As the only intervenor in this proceeding advocating specifically for a transition from coal to clean energy that maintains reliable service at affordable rates, ICL brings a unique and valuable perspective to this proceeding. Allowing intervention enables ICL to fully participate in this proceeding to represent our interests while denying intervention would deprive ICL of this ability. Because this Commission has directed all utilities to fairly and accurately consider all supply-side and demand-side resources when developing a least-cost, least-risk plan, 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 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.

Respectfully submitted this 6<sup>th</sup> day of April 2020,

/s/ Benjamin Otto  
Benjamin J. Otto  
Idaho Conservation League

#### **CERTIFICATE OF SERVICE**

I hereby certify that on this 6th day of April, 2020, I delivered true and correct copies of the foregoing PETITION TO INTERVENE to the following persons via the method of service noted:

/s/ Benjamin Otto  
Benjamin J. Otto

Electronic mail only (See Order 34602):  
*Idaho Public Utilities Commission*  
Diane Hanian, Secretary  
secretary@puc.idaho.gov

*Avista*  
David J. Meyer, David.Meyer@avistacorp.com  
Linda M. Gervais, Linda.Gervais@avistacorp.com