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IDAHO PUBLIC  
UTILITIES COMMISSION

Attorney for the Idaho Conservation League

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

<b>IN THE MATTER OF THE</b>	)	
<b>APPLICATION OF AVISTA</b>	)	<b>CASE NO. AVU-E-19-04</b>
<b>CORPORATION FOR THE</b>	)	
<b>AUTHORITY TO INCREASE ITS</b>	)	
<b>RATES AND CHARGES FOR</b>	)	<b>PETITION TO INTERVENE OF THE</b>
<b>ELECTRIC CUSTOMERS IN THE</b>	)	<b>IDAHO CONSERVATION LEAGUE</b>
<b>STATE OF IDAHO</b>	)	

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. 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  
Idaho Conservation League  
710 N. 6<sup>th</sup> st.  
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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. Idaho Conservation League claims a direct and substantial interest in this proceeding arising from the impact to its members served by Avista and to its long-term role advocating for public values. 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. ICL as an organization, and on behalf of our members how are Avista customers, have a direct and substantial interest in ensuring prudent capital investments and operational spending by Avista along with fair, just, and reasonable electric rates for customers. ICL brings a unique and valuable perspective to this proceeding by virtue of our focus on highlighting the full costs and future risks of spending on fossil fueled generation and our goal to craft electric rates the encourage the efficient use of electricity by consumers. By responding to Avista's requests for additional revenues and rate changes 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 intends to seek intervenor funding pursuant to IDAPA 31.01.01.161-165.

WHEREFORE, ICL respectfully requests the Commission grant this petition.

DATED this 25<sup>th</sup> day of June, 2019.

Respectfully submitted,



Benjamin J. Otto  
Idaho Conservation League



## CERTIFICATE OF SERVICE

I certify that on the 25th day of June, 2018, 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


Electronic Mail only:

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