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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 )**  
**APPLICATION OF AVISTA )**  
**CORPORATION FOR AN ORDER )** **CASE NO. AVU-E-21-13**  
**AUTHORIZING PILOT PROGRAMS )** **PETITION TO INTERVENE OF THE**  
**FOR THE RESEARCH AND )** **IDAHO CONSERVATION LEAGUE**  
**DEVELOPMENT OF ELECTRIC )**  
**TRANSPORTATION )**

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 Idaho Conservation League 710 N. 6 <sup>th</sup> St. Boise, Idaho 83702 Ph: (208) 286-4452 botto@idahoconservation.org	Emma E. Sperry Idaho Conservation League 710 N. 6 <sup>th</sup> St. Boise, Idaho 83702 Ph: 208-537-7993 ext 230 esperry@idahoconservation.org
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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 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. ICL's intervention in this proceeding will represent the interests of members who want to utilize electric vehicle technology as well as the interests of member-ratepayers who want to ensure that funding for Avista's EV program is properly sourced. Because ICL's intervention will focus on two issues discussed by Avista in their application - proper implementation and cost-effective funding of Avista's EV program – ICL's intervention will not unduly broaden the issues presented 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 dependent 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 5<sup>th</sup> day of November, 2021,

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

#### **CERTIFICATE OF SERVICE**

I hereby certify that on this 5th day of November, 2021, 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*  
Jan Noriyuki, Secretary  
secretary@puc.idaho.gov

*Avista*  
David J. Meyer, Chief Counsel and V.P.  
david.meyer@avistacorp.com

Linda Gervais-Falkner, Senior Manager  
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