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**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

<b>IN THE MATTER OF THE</b>	)	<b>CASE NO. AVU-E-23-01;</b>
<b>APPLICATION AVISTA</b>	)	<b>AVU-G-23-01</b>
<b>CORPORATION FOR THE</b>	)	
<b>AUTHORITY TO INCREASE ITS</b>	)	<b>PETITION TO INTERVENE</b>
<b>RATES AND CHARGES FOR</b>	)	
<b>ELECTRIC AND NATURAL GAS</b>	)	<b>IDAHO CONSERVATION LEAGUE</b>
<b>SERVICE FOR ITS ELECTRIC</b>	)	<b>AND NW ENERGY COALITION</b>
<b>AND NATURAL GAS CUSTOMERS</b>	)	
<b>IN IDAHO</b>	)	

COMES NOW the Idaho Conservation League (“ICL”) and the NW Energy Coalition (“NWEC”) and hereby requests leave to intervene in the above captioned matter to pursuant to the Idaho Public Utilities Commission Rules of Procedure, IDAPA 31.01.01.071-073. As discussed below, ICL and NWEC have direct and substantial interests in these proceedings, and therefore should be granted intervention.

1. The name of this intervenor is:

Marie Callaway Kellner  
Attorney for the Idaho Conservation League  
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Please provide copies of all pleadings, production requests, production responses, Commission orders, and other documents to the names and addresses above. Please provide the same documents to the following:

Brad Heusinkveld  
Idaho Conservation League, Energy Associate  
710 N. 6<sup>th</sup> St.  
Boise, Idaho 83702  
Phone: (208) 340-4423  
Email: bheusinkveld@idahoconservation.org

In the interest of reducing costs to all parties, pleadings, testimony, briefs, production requests, responses, notices, Commission orders, and other filings may be submitted via electronic mail in accordance with Idaho Public Utilities Commission Rule 31.01.01.063.02-03. ICL and NWEAC reserve the right to request hard copies of papers and documents, as may be necessary with appropriate notice and time.

2. Idaho Conservation League and NW Energy Coalition claim a direct and substantial interest in this proceeding on behalf of our members who are customers of Avista Corporation. As Idaho's largest state-based conservation organization, ICL has approximately 11,000 members, many of whom are residential customers of Avista. ICL represents its organizational interest, the interests of its members generally, and those who are customers within the Company's service territory. NWEAC has over 100 organizational members throughout Idaho, Montana, Washington, and Oregon. NWEAC claims an interest in this case on behalf of its eleven

member organizational members in Idaho. As a result, ICL and NWECA and their members have a direct and substantial interest in ensuring that Avista Corporation provides a fair rate structure that does not unduly burden residential and small commercial customers, and those interested in energy savings and conservation. The Commission has consistently granted ICL's intervention in Avista dockets on similar grounds. The NW Energy Coalition has also intervened in other utility dockets in Idaho on these grounds. ICL and NWECA's intervention will respond directly to the issues raised in the Company's application and will not unduly broaden the scope of the issues or this proceeding. Joint intervention is intended to limit duplicative filings and efforts.

3. ICL and NWECA intend to fully participate in this matter as a party. The nature and quality of ICL's intervention in this proceeding is dependent upon the nature and effect of other evidence in this proceeding. If necessary, we may introduce evidence, be heard in argument, and call, examine, and cross-examine witnesses. ICL and NWECA may seek intervenor funding pursuant to IDAPA 31.01.01.161-165.

WHEREFORE, ICL and NWECA respectfully request the Commission grant this petition.

DATED this 14<sup>th</sup> of March 2023.

Respectfully submitted

*/s/ Marie Callaway Kellner*  
Marie Callaway Kellner (ISB No. 8470)  
Attorney for Idaho Conservation League

*/s/ F. Diego Rivas*  
F. Diego Rivas (MT State Bar No.  
68806741, *pro hac vice* admission pending)  
Attorney for NW Energy Coalition

## CERTIFICATE OF SERVICE

I hereby certify that on this 13<sup>th</sup> day of March, 2023, I delivered true and correct copies of the foregoing PETITION TO INTEVENE to the following persons via the method of service noted:

/s/ Marie Callaway Kellner

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Electronic Mail Only (See Order No. 35058):

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