Advocates for the West Alaska Housing Finance Corporation Alliance to Save Energy Alternative Energy Resources Organization The Applio Alliance Audubon Washington Bonneville Environmental Foundation Central Area Motivation Program Citizens Utility Board of Oregon City of Ashland Clackamas County Weatherization The Climate Trust Community Action Partnership of Oregon Community Action Partnership Assoc. of Idaho Conservation Services Group David Suzuki Foundation Earth and Spirit Council Earth Ministry Ecos Consulting Ecological Design Center eFormative Options, LLC Emerald People's Utility District The Energy Project Energy Trust of Oregon, Inc. enXco Development Corporation Environment Oregon
Environment Washington Eugene Water & Electric Board Friends of the Earth Golden Eagle Audubon Society Grasslands Renewable Energy Horizon Wind Energy Home Performace Washington Housing and Comm. Services Agency of Lane Co. Human Resources Council, District XI Iberdrola Renewa Idaho Conservation League Idaho Rivers United Idaho Wildlife Federation Interfaith Network for Earth Concerns Kootenai Environmental Alliance Laborers International Linion of North America, NW Region League of Women Voters - ID, OR & WA Metrocenter YMCA Missoula Urban Demonstration Project Montana Audubon Montana Environmental Information Center Montana Public Interest Research Group Montana Renewable Energy Association Montana River Action Montana Trout Unlimited Moontown Foundation Multnomah County Weatherization National Center for Appropriate Technology Natural Resources Defense Council New Buildings Institute Northern Plains Resource Council Northwest Energy Efficiency Council rable Energy Institute Northwest Solar Center NW SEED Olympic Community Action Programs Opportunities Industrialization Center of WA Opportunity Council Oregon Action Oregon Energy Coordinators Association Oregon Environmental Council Oregon HEAT Pacific Energy Inr Pacific NW Regional Council of Carpenters **Pacific Rivers Council** The Policy Institute Portland Energy Conservation Inc. **Portland General Electric** Puget Sound Alliance for Retired Americans **Puget Sound Energy** Renewable Northwest Project Salmon for All Save Our Wild Salmon Seattle Audubon Society Seattle City Light Sierra Club, BC and MT Chapters Snake River Alliance Solar Oregon Solar Washington South Central Community Action Partnership, Inc Southeast Idaho Community Action Agency Southern Alliance for Clean Energy Spokane Neighborhood Action Programs Student Advocates for Valuing the Environt Tahoma Audubon Society **Trout Unlimited Union Of Concerned Scientists** United Steelworkers of America, District 11 WA CTED - Housing Division Washington CAN! Washington Enviro mental Council Washington State University Energy Program Working for Equality And Economic Liberation A World Institute for a Sustainable Humanity World Steward

3TIER Environmental Forecast Group



July 22, 2011

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

Dear Ms. Jewell,

Pursuant to Commission Order 32272, please find attached the NW Energy Coalition's Petition for Late Intervention to the Public Utilities Commission in Case No. IPC-E-11-08. This petition is being filed electronically to the Commission and all other parties in the Case. Four copies are being submitted to the Commission via mail.

Respectfully submitted,

Nancy Hirsh Policy Director NW Energy Coalition

811 1st Ave., Suite 305

Seattle, WA 98104

July 22, 2011 Nancy Hirsh NW Energy Coalition 811 1st Ave., Suite 305 Seattle, WA 98104 Ph: (206) 621-0094

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UTILITIES COMMISSION

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION) -	CASE NO. IPC-E-11-08
OF IDAHO POWER COMPANY FOR)	
AUTHORITY TO INCREASE ITS RATES)	PETITION FOR LATE
AND CHARGES FOR ELECTRIC) ,	INTERVENTION
SERVICE IN IDAHO)	
	.)	NW ENERGY COALITION

COMES NOW, The NW Energy Coalition ("Coalition") and pursuant to this Commission's Rules of Procedure, Rule 71 IDAPA 31.01.01.071 and 073 hereby requests permission for late intervention in the above- referenced case, IPC-E-11-08. The name and address of this intervener and our interests in this case are presented as follows:

A. The Coalition's business address is:

NW Energy Coalition 811 1st Ave Suite 305 Seattle, WA 98104 206-621-0094

- B. The Coalition will be represented in this proceeding by Nancy Hirsh, Policy Director of the Coalition. Correspondence in this docket can be sent to the above address or via email to: nancy@nwenergy.org. Ms. Hirsh's cell phone is: 206-409-9217
- C. The Coalition is a non-profit organization under section 501(c)(3) of the Internal Revenue Code. The Coalition has 11 organizational members located in Idaho, representing more than 100,000 citizens. The Coalition's primary purpose is to promote an energy future that is clean, reliable, affordable, and equitable. Due to its historic and ongoing work with utility companies and others to achieve these goals, the Coalition possesses unique interest in the outcome of this proceeding.
- D. The Coalition has a special interest in this proceeding for the following reasons: (1) Coalition members will be directly affected by rate changes for the residential class; (2) the fixed cost recovery mechanism and rate design modifications that are proposed in this proceeding may

affect customer investment in energy efficiency and affordability for low-income customers; and (3) treatment of demand response incentives as power supply expenses could impact overall commitments to energy efficiency and the strategy for DSM investments. The Coalition intends to examine these and other issues in this proceeding. We believe that our participation in this proceeding will assist the Commission and the Parties in working toward a successful outcome by bringing our considerable energy efficiency and rate design expertise to the case to protect its interest in ensuring adequate and effective DSM investments throughout the Pacific Northwest region.

E. The Coalition offers this process considerable expertise arising from its long-term role in advocating for DSM investments in Idaho and across the region. The Coalition has been a member of the Idaho Power Energy Efficiency Advisory Group since 2003. Petitioner, Nancy Hirsh, has participated in Commission sponsored workshops on DSM incentives and is a member of the Idaho Energy Efficiency Task Force. The Coalition has previously been granted intervener status in cases regarding Idaho Power before the Idaho Public Utilities Commission, including a rate case (Docket No. IPC-E-03-13).

F. The Coalition applies for late intervention under IDAPA 31.01.073 due to a death in the family of Ms. Hirsh and an extended absence from the office. The Coalition has no intention of unreasonably broadening the issues, burdening the record or delaying the proceedings through its intervention.

G. To further support the PUC and other parties in this case and to speed responsiveness of the Coalition, the Coalition requests Electronic Service Only for document distribution in this proceeding.

For the foregoing reasons, the Coalition requests the Commission grant its Petition for Late Intervention in this matter.

July 22, 2011

Respectfully submitted,

Nancy Hirsh, Policy Director

NW Energy Coalition

811 1st Ave, Suite 305

Seattle, WA 98104

206-621-0094

nancy@nwenergy.org