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*Attorney for Sierra Club*

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IDAHO PUBLIC  
UTILITIES COMMISSION

Zack Waterman  
IDAHO SIERRA CLUB  
503 W Franklin St  
Boise, ID 83702  
Telephone: (208) 384-1023  
zack.waterman@sierraclub.org

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF IDAHO POWER )  
COMPANY'S APPLICATION FOR AUTHORITY )  
TO ESTABLISH NEW SCHEDULES FOR RESIDENTIAL )  
AND SMALL GENERAL SERVICE CUSTOMERS WITH )  
ON-SITE GENERATION )

**IPC-E-17-13**

**PETITION TO INTERVENE OF SIERRA CLUB**

Pursuant to IDAPA 31.01.01.042, Sierra Club hereby submits this petition to intervene in the above captioned matter.

1. The name and address for Sierra Club is:

Sierra Club  
Attn: Zack Waterman  
503 W Franklin St  
Boise, ID 83702

2. Sierra Club is a national, non-profit environmental and conservation organization incorporated under the laws of the State of California, duly qualified to do business in the State of Idaho. Sierra Club has 3,200 members who live and purchase utility services in Idaho, and many of those Sierra Club members are customers of Idaho Power.
3. Sierra Club's Idaho members have a direct and substantial interest in this proceeding. Sierra Club's work includes advocating for the implementation of programs that assist its members and utility consumers generally to access renewable energy and increase energy efficiency. The Sierra Club's work includes intervening in dockets at public utility commissions nationwide, submitting comments in numerous state and federal agency energy-related proceedings and

rule-makings, attending and speaking at public hearings, speaking to students and civic and other organizations, and holding seminars and symposia - all in support of policies to reduce the impact of climate change and other air pollution by promoting clean energy alternatives and energy efficiency. Sierra Club members have worked tirelessly to promote clean energy alternatives and energy efficiency measures in Idaho.

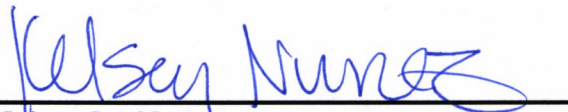
4. Sierra Club's participation as an intervenor in this proceeding will not unduly broaden the issues or delay the proceeding because Sierra Club's interest is directly related to the subjects addressed in Idaho Power's application. Sierra Club's involvement in this proceeding will not be duplicative of other parties in this proceeding because no other party adequately represents Sierra Club's interests.
5. Sierra Club requests that all future pleadings, correspondence, discovery, and other documents should be provided to Kelsey Nunez and Zack Waterman to the addresses stated above as well as to Michael Heckler.

Michael Heckler  
3606 N Prospect Way  
Garden City, ID 83714  
[michael.p.heckler@gmail.com](mailto:michael.p.heckler@gmail.com)

WHEREFORE, Sierra Club respectfully requests that the Commission issue an order granting Sierra Club permission to intervene in this matter.

Dated this 6th day of September, 2017.

Respectfully submitted,



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Kelsey Jae Nunez  
Attorney for Sierra Club

## CERTIFICATE OF SERVICE

I hereby certify that on this 6<sup>th</sup> day of September, 2017, true and correct copies of the above PETITION TO INTERVENE OF SIERRA CLUB were sent to the following persons via the methods noted:

### **Hand delivered and emailed:**

Diane Hanian  
Commission Secretary  
Idaho Public Utilities Commission  
472 W. Washington St.  
Boise, ID 83702  
diane.holt@puc.idaho.gov  
(original plus seven copies)

### **Emailed:**

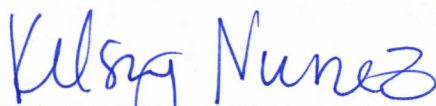
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