## FISHER PUSCH LLP

ATTORNEYS AND COUNSELORS AT LAW

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John R. Hammond, Jr.

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jrh@fisherpusch.com

IDAHO PUBLIC

IIILITIES COMMISSION

September 7, 2017

## Via Hand Delivery

Diane Hanian
Secretary
IDAHO PUBLIC UTILITIES COMMISSION
472 W. Washington St.
Boise, Idaho 83720

Re: IPC-E-17-13; In the Matter of Idaho Power Company's Petition to Modify Terms and Conditions of Prospective PURPA Energy Sales Agreements

Enclosed for filing in the above matter, please find an original and eight (8) copies of Petition to Intervene of the Snake River Alliance and NW Energy Coalition. If you have any questions, please do not hesitate to contact me. Kindly return a file stamped copy to me.

Sincerely,

FISHER PUSCH LLP

John R. Hammond, Jr.

JRH/nj Enclosures cc: Client

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John R. Hammond, Jr. – ISB No. 5470 **FISHER PUSCH LLP**U.S. BANK PLAZA – 7<sup>th</sup> Floor
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(DAHO PUBLIC UTILITIES COMMISSION

Telephone: 208.331.1000 Facsimile: 208.331.2400

E-mail: jrh@fisherpusch.com

Attorneys for the Snake River Alliance and NW Energy Coalition

## BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER	) Case No. IPC-E-17-13
COMPANY'S PETITION TO MODIFY	
TERMS AND CONDITIONS OF	) PETITION TO INTERVENE OF THE
PROSPECTIVE PURPA ENERGY	) SNAKE RIVER ALLIANCE AND NW
SALES AGREEMENTS	) ENERGY COALITION
	)

COMES NOW the Snake River Alliance and the NW Energy Coalition (collectively the "Intervenor") pursuant to the Idaho Public Utilities Commission's Rules of Procedure Rule 71, IDAPA 31.01.01.071, *et seq.*, and petition the Commission to grant their petition to appear collectively as an intervenor in the above-referenced case. The Intervenor asks leave to intervene herein and to appear and participate as a party herein, and as basis therefor states as follows:

1. The name and address of each Intervenor is as follows:

SNAKE RIVER ALLIANCE 223 N. 6<sup>th</sup> St., Ste. 317 PO Box 1731 Boise, ID 83701 Ph: (208) 344-9161 wwilson@snakeriveralliance.org

And

ORIGINAL

NW Energy Coalition 1101 8<sup>th</sup> Ave Helena, MT 59601

Ph: 406-461-6632 diego@nwenergy.org

The Intervenor will be jointly represented by:

John R. Hammond Jr.
Fisher Pusch LLP
101 South Capitol Blvd., Suite 701
Boise, Idaho 83702
jrh@fisherpusch.com
(208) 331-1000
(208) 331-2400

To reduce costs and environmental impacts of exchanging information in this case, the Intervenor requests that, pursuant to IPUC Rules, information other than that which might be deemed confidential or otherwise must be delivered via mail be provided electronically and/or via email to the Intervenor's and Mr. Hammond's respective email addresses above.

2. The Snake River Alliance (the "Alliance") is an Idaho-based non-profit organization, established in 1979 to address Idahoans' concerns about nuclear waste and safety issues. In 2007, the Alliance expanded its mission and became Idaho's first nonprofit clean energy advocacy organization. The Alliance's energy program includes advocacy for renewable energy resources in Idaho; expanded conservation and demand-side management programs offered by Idaho's regulated electric utilities and the Bonneville Power Administration; and development of local, state, regional, and national initiatives to advance sustainable energy policies, including electric utility rate structures and designs that promote energy conservation; and leading the "Solarize the Valley" 2016 and 2017 community campaigns which to date have assisted 75 households to install net metering systems in the Idaho Power service area. The Alliance pursues these programs on behalf of its members, most of whom are customers of Idaho Power and many of whom are clean energy generators and net metering customers.

- 3. The NW Energy Coalition ("NWEC") has more than 110 member organizations throughout Washington, Oregon, Montana, and Idaho. NWEC claims an interest in this case on behalf of its 11 organizational members in Idaho. NWEC promotes development of renewable energy and energy conservation, consumer protection, low-income energy assistance, and fish and wildlife restoration on the Columbia and Snake Rivers. NWEC has been a party in cases before the Idaho Utilities Commission and has been active in proceedings on net metering and rate design issues in Idaho, Montana, Washington and Oregon.
- 4. The Alliance and NWEC have a direct and substantial interest in these proceedings as the Company's request raises significant policy issues of interests, specifically with regard to ensuring equitable rate design for net-metered customers. Further, these proceedings and Commission final order will impact its members who are metering customers. The Alliance and NWEC both have a history of participating before this Commission in cases relating to Idaho Power's renewable energy programs and initiatives. The Alliance and NWEC believe their participation as intervenors will not complicate or extend this case, nor will its participation unduly broaden the issues in this case, and that to the extent permitted by Commission Rules it will actively participate in this case as an intervenor.
- 5. The Intervenor intends to participate herein as a party, and if necessary, to introduce evidence, cross-examine witnesses, call and examine witnesses, and be heard in argument. The nature and quality of evidence which the Intervenor will introduce is dependent upon the nature and effect of other evidence in this proceeding.
- 6. Without the opportunity to intervene herein, the Intervenor would be without a manner or means of participating in the lawful determination of issues which may affect its interests and the interests of the members of each organization.

WHEREFORE, the Intervenor respectfully requests that this Commission grant its

Petition to Intervene in these proceedings and to appear and participate in all matters as may be
necessary and appropriate; and to present evidence, call and examine witnesses, present
argument and to otherwise fully participate in these proceedings.

DATED this \_\_\_\_\_\_ day of September 2017.

FISHER PUSCH LLP

John R. Hammond Jr. Attorney for Intervenor

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the \_\_\_\_\_\_day of September, 2017, I served a true and correct copy of the foregoing by delivering the same to each of the following individuals by electronic mail, addressed as follows:

Lisa Nordstrom		U.S. Mail
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ttatum@idahopower.com	X	Electronic Mail
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Diane Hanian		U.S. Mail
Commission Secretary	П	Facsimile
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Idahydro		U.S. Mail
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Idaho Irrigation Pumpers Association, Inc. c/o Eric L. Olsen Echo Hawk & Olsen, PLLC 505 Pershing Avenue, Ste. 100 PO Box 6119 Pocatello, ID 83205 elo@echohawk.com	<ul> <li>□ U.S. Mail</li> <li>□ Facsimile</li> <li>□ Overnight Mail</li> <li>□ Hand Delivery</li> <li>⋈ Electronic Mail</li> </ul>
Anthony Yankel 12700 Lake Avenue, Unit 2505 Lakewood, OH 44107 tony@yankel.net	<ul> <li>□ U.S. Mail</li> <li>□ Facsimile</li> <li>□ Overnight Mail</li> <li>□ Hand Delivery</li> <li>⋈ Electronic Mail</li> </ul>
Elias Bishop Auric Solar, LLC 2310 S. 1300 W. West Valley City, UT 84119 elias.bishop@auricsolar.com	<ul> <li>□ U.S. Mail</li> <li>□ Facsimile</li> <li>□ Overnight Mail</li> <li>□ Hand Delivery</li> <li>⋈ Electronic Mail</li> </ul>
Abigail R. Germaine Deputy City Attorney Boise City Attorney's Office 150 N. Capitol Blvd. PO Box 500 Boise, ID 83701-0500 Telephone: (208) 608.7950 Facsimile: (208) 384.4454	<ul> <li>□ U.S. Mail</li> <li>□ Facsimile</li> <li>□ Overnight Mail</li> <li>□ Hand Delivery</li> <li>⋈ Electronic Mail</li> </ul>

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