Benjamin J. Otto (ISB No. 8292) 710 N 6<sup>th</sup> Street Boise, ID 83701 Ph: (208) 345-6933 x 12

Fax: (208) 344-0344

botto@idahoconservation.org

RECEIVED 2018 OCT 31 PM 2: 29

IDAHO PUBLIC UTILITIES COMMISSION

Attorney for the Idaho Conservation League

### BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE	
APPLICATION OF IDAHO POWER	CASE NO. IPC-E-18-15
COMPANY TO STUDY THE COSTS,	
BENEFTIS, AND COMPENSATION OF	PETITION TO INTERVENE OF THE IDAHO CONSERVATION LEAGUE
NET EXCESS ENERGY SUPPLIED BY	
CUSTOMER ON-SITE GENERATION	

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) 345-6933 x 12 Fax: (208) 344-0344

botto@idahoconservation.org

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 as a customer and on behalf of our members who are customers of Idaho Power and desire equitable access to clean energy options. As Idaho's largest state-based conservation organization, we have approximately 11,000 members most of whom are residential customers of Idaho Power. ICL and our members have a long-standing interest in ensuring utility rates and programs are fair, just, and reasonable while expanding access to Idaho's clean resource options. ICL intervention here will focus on the full range of costs and benefits that influence the value customer-owned generation brings to Idaho Power's system and thus will not unduly broaden the issues.
- 3. ICL intends to fully participate in this matter as a party. The nature and quality of ICL's intervention in the proceeding is dependant 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 intends to seek intervenor funding pursuant to IDAPA 31.01.01.161-165.

WHEREFORE, ICL respectfully requests the Commission grant this petition.

DATED this 31st day of October 2018.

Respectfully submitted,

Benjamin J. Otto

Idaho Conservation League

### **CERTIFICATE OF SERVICE**

I hereby certify that on this 31<sup>st</sup> day of October, 2018, I delivered true and correct copies of the foregoing PETITION TO INTERVENE to the following persons via the method of service noted:

# Hand delivery:

Jean Jewell Commission Secretary (Original and seven copies provided) Idaho Public Utilities Commission 427 W. Washington St. Boise, ID 83702-5983

## Electronic Mail:

Idaho Power
Lisa D. Nordstrom
Tim Tatum
Connie Aschenbrenner
Inordstrom@idahopower.com
ttatum@idahopower.com
caschenbrenner@idahopower.com
dockets@idahopower.com

Idaho PUC Staff
Sean Costello
Deputy Attorney General
Idaho Public Utilities Commission
sean.costello@puc.idaho.gov

Idahohydro C Tom Arkoosh Arkoosh Law Offices tom.arkoosh@arkoosh.com erin.cecil@arkoosh.com

Idaho Irrigation Pumpers Association Eric L. Olsen Echo Hawk & Olsen PLLC elo@echohawk.com

Anthony Yankel tony@yankel.net

Idaho Clean Energy Association
Preston N. Carter
Deborah E. Nelson
Givens Pursley LLC
prestoncarter@givenspursley.com
den@givenspursley.com

Sierra Club Kelsey Jae Nunez, LLC Sierra Club kelsey@kelseyjaenunez.com

Zack Waterman Idaho Sierra Club zack.waterman@sierraclub.org michael.p.heckler@gmail.com

City of Boise
Abigail R. Germaine
Deputy City Attorney
agermaine@cityofboise.org

Vote Solar
David Bender
Earthjustice
dbender@earthjustice.com

Briana Kober Vote Solar 360 22nd Street, Suite 730 Oakland, CA 94612 birana@votesolar.org Snake River Alliance and NWEC John R. Hammond, Jr. Fischer Pusch, LLP jrh@fischerpusch.com

Wendy Wilson Executive Director, Snake River Alliance wwilson@snakeriveralliance.org

Diego Rivas Policy Associate, NW Energy Coalition diego@nwenergy.com

Intermountain Wind and Solar, LLC Ryan B. Frazier Brian W. Burnett rfrazier@kmclaw.com bburnett@kmclaw.com

Intermountain Wind and Solar, LLC doug@imwindandsolar.com dale@imwindandsolar.com

Benjamin J. Otto