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Attorneys for the Snake River Alliance

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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE PETITION) Case No. IPC-E-18-15
OF IDAHO POWER COMPANY TO)
STUDY THE COSTS, BENEFITS, AND) PETITION TO INTERVENE OF THE
COMPENSATION OF NET EXCESS) SNAKE RIVER ALLIANCE
ENERGY SUPPLIED BY CUSTOMER	
ON-SITE GENERATION	
)

COMES NOW the Snake River Alliance (the "Intervenor") and pursuant to Rules 71 through 73 of the Rules of Procedure of the Idaho Public Utility Commission (IDAPA 31.01.01 .71 -31.01.0.73) and, pursuant to that Petition filed on October 19, 2018, and Notice of Petition and Notice of Intervention Deadline, Order No. 34189, filed on November 9, 2018, hereby petitions the Commission for leave to intervene herein and to appear and participate as a party, and as basis therefore states as follows:

The name and address of each Intervenor is as follows:

SNAKE RIVER ALLIANCE c/o Amy C. Hilton 223 N. 6th St., Ste. 317 PO Box 1731 Boise, ID 83701 Ph: (208) 344-9161 achilton@snakeriveralliance.org The Intervenor will be represented by:

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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.

- 1. The Intervenor is an Idaho-based non-profit organization, established in 1979 to address Idahoans' concerns about nuclear waste and safety issues. In 2007, the Intervenor expanded its mission and became Idaho's first nonprofit clean energy advocacy organization. The Intervenor'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 Intervenor 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.
- 2. The Intervenor has 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 Intervenor has a history of participating before this Commission in cases relating to Idaho Power's renewable energy programs and initiatives. In this case generally, the Intervenor will focus on issues, including but not limited to, what is the fair value for the costs, benefits, and compensation (credits) for net excess energy supplied by Idaho Power Company customers with on-site generation to the utility. The Intervenor believes 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. Further, Intervenor participated as a party in Case No. IPC-E-17-13, In the Matter of the Application of Idaho Power Company for Authority to Establish New Schedules for Residential and Small General Service Customer with On-Site Generation.

- 3. 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.
- 4. 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 **30** day of November 2018.

FISHER PUSCH LLP

John R. Hammond Jr. Attorney for Intervenor

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 30th day of November, 2018, 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
Regulatory Dockets	☐ Facsimile
Idaho Power Company	☐ Overnight Mail
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Boise, ID 83707	☐ Hand Delivery
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