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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-18-16
COMPANY TO STUDY FIXED COSTS	)	
OF PROVIDING ELECTRIC SERVICE	)	PETITION TO INTERVENE OF THE
TO CUSTOMERS	)	IDAHO CONSERVATION LEAGUE
	)	

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  
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Boise, Idaho 83702  
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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 fair, just, and reasonable rates and charges for electricity that promote the efficient use of Idaho's resources. 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 identifying, allocating, and recovering fixed costs in a manner that encourages individuals to conserve energy while providing the utility an opportunity to recover authorized revenues. ICL intervention here will focus on the accurate and equitable identification, allocation, and recovery of fixed costs 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,



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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:

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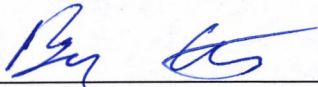
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Benjamin J. Otto