

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

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IDAHO PUBLIC  
UTILITIES COMMISSION

Attorney for the NW Energy Coalition

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF THE )  
APPLICATION OF IDAHO POWER )  
COMPANY TO STUDY FIXED COSTS )  
OF PROVIDING ELECTRIC SERVICE )  
TO CUSTOMERS )

CASE NO. IPC-E-18-16  
PETITION TO INTERVENE OF THE  
NW ENERGY COALITION

COMES NOW the NW Energy Coalition (NVEC) 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, NVEC has direct and substantial interests in these proceedings, and therefore should be granted intervention.

1. The name of this intervenor is:

F. Diego Rivas  
NW Energy Coalition  
1101 8<sup>th</sup> Ave  
Helena, MT 59601  
Ph: (406) 461-6632  
diego@nwenergy.org

This Intervenor will be represented in this matter by:

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. NWECC claims a direct and substantial interest in this proceeding on behalf of our 11 organizational members in Idaho, many of whom have individual members that are customers of Idaho Power. NWECC 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. NWECC has been a party in cases before the Idaho Utilities Commission and has been active on proceedings regarding fixed costs and fixed cost recovery in Idaho, Montana, Washington and Oregon. NWECC and our organizational members have a long-standing interest in the recovery of utility fixed costs in a manner that encourages energy conservation as well as protects the most vulnerable members of our communities. NWECC intervention will focus on the accurate and equitable identification, allocation, and recovery of fixed costs and thus will not unduly broaden the issues.

3. NWECC intends to fully participate in this matter as a party. The nature and quality of NWECC's intervention in the proceeding is dependent upon the nature and effect of other evidence in this proceeding. If necessary NWECC may introduce evidence, be heard in argument, and call, examine, and cross-examine witnesses. NWECC intends to seek intervenor funding pursuant to IDAPA 31.01.01.161-165.

WHEREFORE, NWECC respectfully requests the Commission grant this petition.

DATED this 20<sup>th</sup> Day of November 2018.

Respectfully submitted,



Benjamin J. Otto

Idaho Conservation League

## CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of November, 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  
lnordstrom@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@kelseyaenunez.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

*Intermountain Wind and Solar, LLC*

Ryan B. Frazier

Brian W. Burnett

[rfrazier@kmclaw.com](mailto:rfrazier@kmclaw.com)

[bburnett@kmclaw.com](mailto:bburnett@kmclaw.com)

Intermountain Wind and Solar, LLC

[doug@imwindandsolar.com](mailto:doug@imwindandsolar.com)

[dale@imwindandsolar.com](mailto:dale@imwindandsolar.com)



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Benjamin J. Otto