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*Attorney for the Idaho Sierra Club*

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IDAHO PUBLIC  
UTILITIES COMMISSION

Zack Waterman  
IDAHO SIERRA CLUB  
503 W Franklin St  
Boise, ID 83702  
Telephone: (208) 384-1023  
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**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

<b>IN THE MATTER OF THE</b>	)	
<b>APPLICATION OF IDAHO POWER</b>	)	<b>CASE NO. IPC-E-18-16</b>
<b>COMPANY TO STUDY FIXED</b>	)	
<b>COSTS OF PROVIDING ELECTRIC</b>	)	<b>PETITION TO INTERVENE</b>
<b>SERVICE TO CUSTOMERS</b>	)	<b>OF THE IDAHO SIERRA CLUB</b>

Pursuant to IDAPA 31.01.01.042, the Idaho Sierra Club (“Sierra Club”) hereby submits this petition to intervene in the above captioned matter. As discussed below, Sierra Club has direct and substantial interests in these proceedings, and therefore should be granted intervention.

1. The name of this intervenor is:

Idaho Sierra Club  
Zack Waterman  
Mike Heckler  
503 W Franklin St  
Boise, Idaho 83702  
Ph: (208) 384-1023  
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michael.p.heckler@gmail.com

This Intervenor will be represented by:

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Please provide copies of all pleadings, production requests, production responses, Commission orders, and other documents to the names and addresses above. Production requests, responses, notices, Commission orders, and other filings via electronic mail are preferred and allowed in accordance with IPUC Rules 31.01.01.063.02-03.

2. Sierra Club is a national, non-profit environmental and conservation organization incorporated under the laws of the State of California, duly qualified to do business in the State of Idaho. Sierra Club has 3,600 members who live and purchase utility services in Idaho, and many of those Sierra Club members are customers of Idaho Power Company.

3. Sierra Club's Idaho members have a direct and substantial interest in this proceeding. Sierra Club's work includes advocating for the implementation of programs that assist its members and utility consumers generally to access renewable energy and increase energy efficiency. The Sierra Club's work includes intervening in dockets at public utility commissions nationwide, submitting comments in numerous state and federal agency energy-related proceedings and rule-makings, attending and speaking at public hearings, speaking to students and civic and other organizations, and holding seminars and symposia - all in support of policies to reduce the impact of climate change and other air pollution by promoting clean energy alternatives and energy efficiency. Sierra Club members have worked tirelessly to promote clean energy alternatives and energy efficiency measures in Idaho.

4. Sierra Club's participation as an intervenor in this proceeding will not unduly broaden the issues or delay the proceeding because Sierra Club's interest is directly related to the subjects addressed in Idaho Power's application. Sierra Club's intervention will focus on equitable allocation and recovery. Sierra Club's involvement in this proceeding will not be duplicative of other parties in this proceeding because no other party adequately represents Sierra Club's interests.

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

WHEREFORE, Sierra Club respectfully requests the Commission grant this petition.

DATED this 30th day of November 2018.

Respectfully submitted,



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Kelsey Jae Nunez  
Attorney for Sierra Club

## CERTIFICATE OF SERVICE

On this 30th 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*

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#### *Yvonne R. Hogle*

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