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IDAHO PUBLIC
UTILITIES COMMISSION

David Bender, WI Bar # 1046102; IA Bar # AT0013602 (*pro hac vice pending*)
Earthjustice
3916 Nakoma Road
Madison, WI 53711
Phone: (202) 667-4500
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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE PETITION OF)	CASE NO. IPC-E-18-16
IDAHO POWER COMPANY TO STUDY)	
FIXED COSTS OF PROVIDING ELECTRIC)	PETITION TO INTERVENE OF
SERVICE TO CUSTOMERS)	VOTE SOLAR
)	
)	

Vote Solar petitions the Idaho Public Utilities Commission (“Commission”) to intervene in this matter on behalf of itself and its members who are customers of Idaho Power Company (“Idaho Power”) pursuant to the Idaho Public Utilities Commission Rules of Procedure, IDAPA 31.01.01.071-073. As discussed in more detail below, Vote Solar has direct and substantial interests in these proceedings.

1. The name and address of Vote Solar is:

Vote Solar
360 22nd Street, Suite 730
Oakland, CA 94612
Phone: (415) 817-5060
Email: briana@votesolar.org

2. Vote Solar is a nonprofit organization working to foster economic opportunity, promote energy security, and fight climate change by making solar a mainstream energy resource. Vote Solar works at the state level across the country to support the policies and programs needed to

bring solar to scale. Vote Solar seeks to promote the development of distributed generation solar resources, wholesale distributed generation, and large-scale solar. Vote Solar is working to implement, maintain, and enhance the policies necessary to build robust solar markets in key states, including Idaho. Vote Solar has over 100,000 members nationally including members in Idaho Power's service territory. Vote Solar has a direct and substantial interest in this proceeding due to the impact to its members served by Idaho Power and to its role advocating for solar energy.

3. Vote Solar's intervention in this proceeding will not unduly broaden the issues or delay the proceeding because the interests of Vote Solar are directly related to the subjects addressed in the Idaho Power's application.

4. Vote Solar requests that all future pleadings, correspondence, discovery, and other documents be served on the following:

Briana Kobor
Vote Solar
358 S 700 E, Suite B206
Salt Lake City, UT 84102
Phone: (415) 817-5060
Email: briana@votesolar.org

David Bender
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Al Luna
Nick Thorpe
1625 Massachusetts Avenue, NW, Suite 702
Washington, DC 20036
Phone: (202) 667-4500
Email: aluna@earthjustice.org
nthorpe@earthjustice.org

5. Vote Solar intends to fully participate in this matter as a party. The nature and quality of Vote Solar's intervention in the proceeding is dependent on the nature and effect of other evidence in this proceeding. Vote Solar has not fully determined the specific positions it will take or the relief it will seek. Vote Solar seeks to intervene for purposes of protecting its

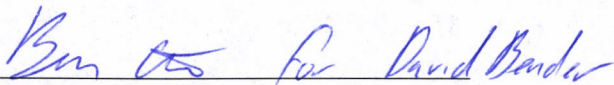
interests as they arise. Vote Solar may seek intervenor funding pursuant to IDAPA 31.01.01.161-165.

WHEREFORE, Vote Solar, respectfully requests the Commission grant this petition.

DATED this 26th day of November, 2018



Benjamin J. Otto
ISB No. 8292
Local Counsel



David Bender
WI Bar # 1046102; IA Bar # AT0013602
Pro Hac Vice Counsel (pro hac vice pending)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this _____ day of November, 2018, served the foregoing **PETITION TO INTERVENE OF VOTE SOLAR** upon all parties of record in this proceeding, via the manner indicated:

FedEx

Diane Hanian
Commission Secretary
Idaho Public Utilities Commission
472 West Washington Street
Boise, ID 83702
Diane.holt@puc.idaho.gov
(Original and seven copies provided)

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