

Kelsey Jae Nunez (ISB No. 7899)
KELSEY JAE NUNEZ LLC
920 N. Clover Dr.
Boise, ID 83703
Phone: (208) 391-2961
kelsey@kelseyjaenunez.com
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
zack.waterman@sierraclub.org

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO)	
POWER'S APPLICATION TO)	CASE NO. IPC-E-19-15
EVALUATE SCHEDULE 84 - NET)	
METERING)	IDAHO SIERRA CLUB
)	PETITION TO INTERVENE
)	

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 and Mike Heckler
503 W Franklin St
Boise, Idaho 83702
Ph: (208) 384-1023
zack.waterman@sierraclub.org
michael.p.heckler@gmail.com

This Intervenor's attorney is:

Kelsey Jae Nunez (ISB No. 7899)
Kelsey Jae Nunez LLC
920 N. Clover Dr.
Boise, Idaho 83703
Ph: (208) 391-2961
Kelsey@kelseyjaenunez.com

Please provide copies of all pleadings, production requests, production responses, Commission orders, and other documents to the names and addresses 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. 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. For many years the Sierra Club has advocated 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 has intervened in the open dockets IPC-E-18-15 and IPC-E-18-16 and has actively participated in ongoing workshops to address the valuing of exports from customer-owned generation systems to the grid, alongside the proper methodology, spread, and recovery of fixed costs. Our members have a direct and substantial interest in policy changes that may impact customers' ability to self generate electricity, as well as with the broader rate design issues that are implicated in restructuring of tariffs as requested by Idaho Power Company in this filing.

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 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 22nd day of April, 2019

Respectfully submitted,

Kelsey Jae Nunez

Kelsey Jae Nunez
Attorney for Sierra Club

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of April, 2019, I delivered true and correct copies of the foregoing PETITION TO INTERVENE to the following persons via the method of service noted:

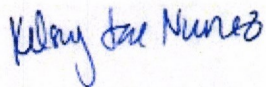
Hand delivery:

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



Kelsey Jae Nunez
Attorney for Sierra Club