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 RECEIVED

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IDAHO PUBLIC UTILITIES COMMISSION

Attorney for the Idaho Conservation League

## BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER )	CASE NO. IPC-E-19-18
COMPANY'S APPLICATION FOR A )	
<b>DETERMINATION VALIDATING A</b> )	PETITION TO INTERVENE OF THE
NORTH VALMY POWER PLANT UNIT )	IDAHO CONSERVATION LEAGUE
2 CLOSURE IN 2025.	

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 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. 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 a stable yet quick transition from coal to clean energy. As Idaho's largest state-based conservation organization, we have approximately 11,000 members most of whom are residential customers of

Idaho Power. ICL's Boise headquarters is a Schedule 9 Idaho Power customer. ICL's engagement in this issue stems back to 2015 and includes joining the settlement that lead to Idaho Power's Valmy exit plan, participating in the PUC review of this exit plan, and our continued analysis to find the optimal date for Idaho Power to exit Valmy completely. ICL intervention here will respond to Idaho Power's proposal and analysis in this application 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 17th day of July 2019.

Respectfully submitted,

Benjamin J. Otto

Idaho Conservation League

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 17th day of July 2019, I delivered true and correct copies of the foregoing PETITION TO INTERVENE to the following persons via the method of service noted:

Benjamin I. Otto

Hand delivery:

Diane Hanian 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

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