

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 Idaho Conservation League

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

<b>IN THE MATTER OF IDAHO POWER</b>	)	<b>CASE NO. IPC-E-19-20</b>
<b>COMPANY'S APPLICATION FOR</b>	)	
<b>APPROVAL OF THE CAPACITY</b>	)	<b>PETITION TO INTERVENE OF THE</b>
<b>DEFICIENCY TO BE UTILIZED FOR</b>	)	<b>IDAHO CONSERVATION LEAGUE</b>
<b>AVOIDED COST CALCULATIONS.</b>	)	

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 utility standards that maintain affordable rates while growing Idaho's independent energy sector. 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, while our Ketchum field-office is a Schedule 7 customer. As ratepayers, ICL and our members have a direct and substantial interest in ensuring contract's Idaho Power enters into with independent clean energy projects are based on fair and accurate avoided cost calculations. Intervention in Idaho Power's request to establish an important input to the avoided cost calculations is a key opportunity to protect this interest. 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.

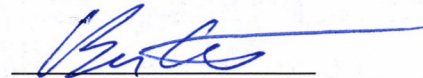
Respectfully submitted,



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 J. 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*  
Donovan E. Walker  
Michael Darrington  
dwalker@idahopower.com  
mdarrington@idahopower.com  
dockets@idahopower.com  
energycontracts@idahopower.com