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Attorney for the Idaho Conservation League

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO)	
POWER COMPANY’S)	
APPLICATION FOR AUTHORITY)	CASE NO. IPC-E-20-26
TO MODIFY SCHEDULE 84’S)	
METERING REQUIREMENT AND)	PETITION TO INTERVENE OF THE
TO GRANDFATHER EXISTING)	IDAHO CONSERVATION LEAGUE
CUSTOMERS WITH TWO METERS)	

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
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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. The 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 fair, just, and reasonable rules governing customer-owned distributed energy systems. ICL's Boise headquarters is a Schedule 9 and Schedule 84 customer who currently suffers from the two-meter rule under review here. As Idaho's largest state-based conservation organization, we have approximately 11,000 members most of whom are residential customers of Idaho Power. While this docket addresses commercial customers, all Idaho Power customers have a direct and cognizable interest in ensuring fair and reasonable program rules. ICL intervention here will focus on the issues raised by Idaho Power – metering needs for future, and legacy rate treatment for existing, Schedule 84 customers 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 10th day of July 2020.

Respectfully submitted,

 /s/ Benjamin Otto
Benjamin J. Otto
Idaho Conservation League

CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of July, 2020, I delivered true and correct copies of the foregoing PETITION TO INTERVENE to the following persons via the method of service noted:

/s/ Benjamin Otto
Benjamin J. Otto

Electronic mail only (See Order 34602)

Diane Hanian
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