

Kelsey Jae (ISB No. 7899)
Law for Conscious Leadership
920 N. Clover Dr.
Boise, ID 83703
Phone: (208) 391-2961
kelsey@kelseyjaenunez.com
Attorney for the Idaho Sierra Club

Lisa Young
Idaho Sierra Club
503 W. Franklin St.
Boise, ID 83702
Telephone: (208) 384-1023
lisa.young@sierraclub.org

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) IDAHO SIERRA CLUB
TO GRANDFATHER EXISTING) PETITION TO INTERVENE
CUSTOMERS WITH TWO)
METERS.)

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

This Intervenor's attorney is:

Kelsey Jae (ISB No. 7899)
Law for Conscious Leadership
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 was active as an intervenor in recent related dockets, including IPC-E-18-15, IPC-E-18-16 and IPC-E-19-15, and has actively participated in ongoing workshops to address matters affecting customer-owned generation systems connected to the grid and the recovery of fixed and variable costs.

Our members have a direct and substantial interest in policy changes that may impact Schedule 84 customers' ability to self-generate electricity, which is affected by this docket and this docket's inherent relationship to the IPC-E-19-15 proceeding. Examples of unresolved matters which could potentially be affected by the IPC-E-20-26 docket include the cost/requirements for metering and other generating system components, the maximum size of Schedule 84 customer systems, and how the price provided for energy in excess of the customer's consumption and the time value of customer exports is reflected in demand charges.

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 dependent 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 21st day of July, 2020

Respectfully submitted,

A handwritten signature in blue ink that reads "Kelsey Jae".

Kelsey Jae
Attorney for Sierra Club

CERTIFICATE OF SERVICE

I hereby certify that on this 21st 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:

Electronic Mail Delivery (See Order No. 34602)

Idaho Public Utilities Commission

Diane Hanian
Commission Secretary
secretary@puc.idaho.gov

Idaho PUC Staff

Sean Costello
Deputy Attorney General
Idaho Public Utilities Commission
sean.costello@puc.idaho.gov

Idaho Power

Lisa D. Nordstrom
Tim Tatum
Connie Aschenbrenner
lnordstrom@idahopower.com
ttatum@idahopower.com
caschenbrenner@idahopower.com
dockets@idahopower.com



Kelsey Jae
Attorney for Sierra Club

Idaho Irrigation Pumpers Association

Eric L. Olsen
Echo Hawk & Olsen PLLC
elo@echohawk.com

Anthony Yankel
tony@yankel.net

Idaho Conservation League

Ben Otto
botto@idahoconservation.org