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IDAHO PUBLIC UTILITIES COMMISSION

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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-20-30
TO ESTABLISH TARIFF)	
SCHEDULE 68,)	PETITION TO INTERVENE OF THE
INTERCONNECTIONS TO)	IDAHO CONSERVATION LEAGUE
CUSTOMER DISTRIBUTED)	
ENERGY RESOURCES)	

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. 6th st.
Boise, Idaho 83702
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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, reducing costs, and in accordance with Order No 34602, please all documents and other materials electronically to the email address above.

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 and we may be impacted by the details in the proposed Schedule 68. As Idaho's largest state-based conservation organization, we have approximately 11,000 members most of whom are residential customers of Idaho Power. Some of these members have customer-owned systems and some of these members are interested in acquiring customer-owned systems in the future. ICL intervention here will focus on the issues raised by Idaho Power – interconnection rules, smart inverter functions, and the potential for non-exporting customer-owned systems – and 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 dependent 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 29th day of July 2020.

Respectfully submitted,

/s/ Benjamin Otto

Benjamin J. Otto
Idaho Conservation League

CERTIFICATE OF SERVICE

I hereby certify that on this 29th 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
Jan Noriyuki
Commission Secretary
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jan.noriyuki@puc.idaho.gov

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