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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</b>	)	
<b>POWER COMPANY'S</b>	)	<b>CASE NO. IPC-E-20-32</b>
<b>APPLICATION TO DECREASE ITS</b>	)	
<b>RATES FOR ELETRCI SERVICE</b>	)	<b>PETITION TO INTERVENE OF THE</b>
<b>FOR COSTS ASSOCIATED WITH</b>	)	<b>IDAHO CONSERVATION LEAGUE</b>
<b>THE BOARDMAN POWER PLANT</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  
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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. Idaho Conservation League claims a direct and substantial interest in this proceeding as an Idaho Power customer and on behalf of our members served by Idaho Power. As Idaho's largest state-based conservation organization, we have approximately 11,000 members most of whom are residential customers of Idaho Power. ICL, as an organization, is a Schedule 9 customer in our Boise office and Schedule 7 customer in our Ketchum office. ICL brings a unique and valuable perspective to this issue due to our long-term engagement with Idaho Power and other stakeholders to facilitate the economic transition away from fossil fueled power plants, including the Boardman coal-fired plant. ICL's intervention will not unduly broaden the issues in this proceeding, other than connecting this docket to Idaho Power's request to increase funding for energy conservation in IPC-E-20-32 as the Company proposes.

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.

Respectfully submitted this 17th day of September 2020.

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

## CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of September, 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 J. Otto

Electronic mail only (See Order 34602):

*Idaho Public Utilities Commission*

Jan Noriyuki, Secretary

Jan.noriyuki@puc.idaho.gov

*Idaho Power*

Lisa D. Nordstrom

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