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IDAHO PUBLIC
UTILITIES COMMISSION

Attorney for the Idaho Conservation League

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO)	
POWER COMPANY'S)	
APPLICATION FOR A)	CASE NO. IPC-E-21-04
DETERMINATION OF 2020)	
DEMAND-SIDE MANAGEMENT)	PETITION TO INTERVENE OF THE
EXPENSES AS PRUDENTLY)	IDAHO CONSERVATION LEAGUE
INCURRED)	

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
Ph: (208) 345-6933 x 112
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 arising from the impact to its members served by Idaho Power and to its long-term role advocating for public values. 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. On behalf of our members, ICL has consistently engaged with Idaho Power and other stakeholders to shape the Company's Demand Side Management programs in order to protect the interests of ensuring affordable energy bills and the continued pursuit of all cost-effective energy conservation. Because this Commission has directed all utilities to pursue all cost-effective energy conservation measures, ICL's intervention will not unduly broaden the issues in this proceeding.

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 may seek intervenor funding pursuant to IDAPA 31.01.01.161-165.

WHEREFORE, ICL respectfully requests the Commission grant this petition.

Respectfully submitted this 27th day of April 2021.

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

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of April, 2021, 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
secretary@puc.idaho.gov

Idaho Power
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Connie Aschenbrenner
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