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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 )                    CASE NO. IPC-E-21-17**  
**POWER COMPANY’S )**  
**APPLICATION FOR AUTHORITY )            PETITION TO INTERVENE OF THE**  
**TO INCREASE ITS RATES FOR )            IDAHO CONSERVATION LEAGUE**  
**ELETRIC SERVICE TO RECOVER )**  
**COSTS ASSOCIATED WITH THE )**  
**JIM BRIDGER POWER PLANT )**

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 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 as a customer and on behalf of our members who are customers of 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's Boise headquarters is a Schedule 9 Idaho Power customer and our Ketchum field office is a Schedule 7 customer. ICL and our members have a direct and substantial interest in the proper accounting for the cost associated with the Jim Bridger plant because this will impact customer rates. ICL will respond to Idaho Power's request to change the financial accounting methods for the recovery of the outstanding Bridger costs and 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 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 June 2021.

Respectfully submitted,

/s/ Benjamin J Otto  
Idaho Conservation League

## CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of May 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  
Idaho Conservation League

Electronic mail only (See Order 34781):

*Idaho Public Utilities Commission*

Jan Noriyuki, Secretary  
secretary@puc.idaho.gov

*Idaho Power*

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Matt Larkin  
lnordstrom@idahopower.com  
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*Industrial Customers of Idaho Power*

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