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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)	CASE NO. IPC-E-21-32
APPLICATION FOR APPROVAL)	
TO MODIFY ITS DEMAND)	PETITION TO INTERVENE OF THE
RESPONSE PROGRAMS)	IDAHO CONSERVATION LEAGUE

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 th St. Boise, Idaho 83702 Ph: (208) 286-4452 botto@idahoconservation.org	Emma E. Sperry Idaho Conservation League 710 N. 6 th St. Boise, Idaho 83702 Ph: 208-537-7993 ext 230 esperry@idahoconservation.org
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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 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. Idaho Power's proposed changes to its Demand Response program directly impact ICL members who are enrolled in Idaho Power DR programs and who are generally concerned about grid reliability and energy affordability. ICL's intervention will respond directly to the issues raised in Idaho Power's application 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 may seek intervenor funding pursuant to IDAPA 31.01.01.161-165.

WHEREFORE, ICL respectfully requests the Commission grant this petition.

DATED this 5th day of November, 2021.

Respectfully submitted,

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

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of November, 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
Benjamin J. Otto

Electronic mail only (See Order 34781):

Idaho Public Utilities Commission
Jan Noriyuki, Secretary
secretary@puc.idaho.gov

Idaho Power
Lisa D. Nordstrom
Connie Aschenbrenner
lnordstrom@idahopower.com
caschenbrenner@idahopower.com
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