2021 DEC 21 PM 1:35 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 TO EXPAND OPTIONAL CUSTOMER CLEAN ENERGY OFFERINGS THROUGH THE CLEAN ENERGY YOUR WAY PROGRAM

CASE NO. IPC-E-21-40

PETITION TO INTERVENE OF THE 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

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interests in these proceedings and therefore should be granted intervention.

1. The name of this intervenor is:

Benjamin J. Otto	Emma E. Sperry
Idaho Conservation League	Idaho Conservation League
710 N. 6 th St.	710 N. 6 th St.
Boise, Idaho 83702	Boise, Idaho 83702
Ph: (208) 286-4452	Ph: 208-537-7993 ext 230
botto@idahoconservation.org	esperry@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

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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 ensuring Idaho Power provides voluntary, fair-priced, and easily accessible programs that allow customers to choose clean options in order to meet our organizational goals and to meet our member's needs. 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 21th day of December, 2021.

Respectfully submitted,

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

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CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of December, 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 35058):

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

Idaho Power Lisa D. Nordstrom Alison Williams Inordstrom@idahopower.com awilliams@idahopower.com knoe@idahopower.com dockets@idahopower.com

Industrial Customers of Idaho Power Industrial Customers of Idaho Power c/o Peter J. Richardson Richardson Adams, PLLC peter@richardsonadams.com

Dr. Don Reading dreading@mindspring.com