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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-21-43
POWER COMPANY'S 2021)
INTEGRATED RESOURCE PLAN.) 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 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
710 N. 6th st.
Boise, Idaho 83702
Ph: (208) 286-4452
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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 and desire

reliable, affordable, and clean energy service from the Company. 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. ICL and our members have a long-standing interest influencing the utilities long-term resource plan in order to maintain reliable and affordable energy while transitioning to clean sources that protect our air and reinvest our energy dollars in Idaho. ICL intervention here will focus on the tools and quality of the inputs Idaho Power used in this planning process 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 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.

DATED this 24th day of January 2022.

Respectfully submitted,



Benjamin J. Otto
Idaho Conservation League

CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of January 2022, I delivered true and correct copies of the foregoing PETITION TO INTERVENE to the following persons via the method of service noted:



Benjamin J. Otto

Electronic mail only (See Order 35058):

Idaho Public Utilities Commission

Jan Noriyuki, Secretary
secretary@puc.idaho.gov

Idaho Power

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Timothy E. Tatum
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