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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 )  
CERTIFICATE OF PUBLIC CONVENIENCE ) CASE NO. IPC-E-22-13  
AND NECESSITY TO ACQUIRE RESOURCES )  
TO BE ONLINE BY 2023 TO SECURE ) PETITION TO INTERVENE  
ADEQUATE AND RELIABLE SERVICE TO ) OF THE IDAHO  
ITS CUSTOMERS ) 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:

Marie Kellner Idaho Conservation League 710 N. 6 <sup>th</sup> St. Boise, Idaho 83702 Ph: (208) 345-6933 x 220 mkellner@idahoconservation.org	Emma E. Sperry Idaho Conservation League 710 N. 6 <sup>th</sup> St. Boise, Idaho 83702 Ph: 208-537-7993 x 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 names 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. ICL 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 that Idaho Power provides access to clean energy, including energy storage options, in the most economical manner possible in order to meet our organizational goals and our members' 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 15th day of June, 2022.

Respectfully submitted,

*/s/ Marie Kellner*  
Marie Kellner  
Idaho Conservation League

## CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of June, 2022, I delivered true and correct copies of the foregoing PETITION TO INTERVENE to the following persons via the method of service noted:

*/s/ Marie Kellner*  
Marie Kellner

Electronic mail only (See Order 35058):

*Idaho Public Utilities Commission*  
Jan Noriyuki, Secretary  
[jan.noriyuki@puc.idaho.gov](mailto:jan.noriyuki@puc.idaho.gov)  
[secretary@puc.idaho.gov](mailto:secretary@puc.idaho.gov)

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