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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 TO COMPLETE)	CASE NO. IPC-E-22-22
THE STUDY REVIEW PHASE OF THE)	
COMPREHENSIVE STUDY OF COSTS AND)	PETITION TO INTERVENE
BENEFITS OF ON-SITE CUSTOMER)	OF THE IDAHO
GENERATION AND FOR AUTHORITY TO)	CONSERVATION LEAGUE
IMPLEMENT CHANGES TO SCHEDULES 6,)	
8, AND 84)	

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:

Emma E. Sperry
Idaho Conservation League
710 N. 6th St.
Boise, Idaho 83702
Ph: 208-537-7993 x 230
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

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. Many ICL members are also customer generators or are interested in becoming customer generators. As a result, ICL and our members have a direct and substantial interest in ensuring that Idaho Power provides a fair compensation rate for exported solar and that Idaho Power's policies do not unduly burden solar customers. 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 21st day of July, 2022.

Respectfully submitted,

/s/ Emma E. Sperry
Emma E. Sperry
Idaho Conservation League

CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of July, 2022, I delivered true and correct copies of the foregoing PETITION TO INTERVENE to the following persons via the method of service noted:

/s/ Emma E. Sperry
Emma E. Sperry

Electronic mail only (See Order 35058):

Idaho Public Utilities Commission

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