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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 FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY FOR THE BOARDMAN TO HEMINGWAY 500KV TRANSMISSION LINE	) ) ) ) ) ) ) )	<b>CASE NO. IPC-E-23-01 PETITION TO INTERVENE OF THE IDAHO CONSERVATION LEAGUE</b>
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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 (“IPUC”) 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 Callaway Kellner  
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Please provide copies of all pleadings, production requests, production responses, Commission orders, and other documents the name and address above. Please provide the same documents to:

Brad Heusinkveld  
Idaho Conservation League, Energy Associate  
710 N. 6th St.  
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Boise, Idaho 83702  
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In the interest of reducing costs to all parties, pleadings, testimony, briefs, production requests, responses, notices, Commission orders, and other filings may be submitted via electronic mail in accordance with IPUC Rule 31.01.01.063.02-03. ICL reserves the right to request hard copies of documents, as may be necessary, with appropriate notice and time.

2. ICL claims a direct and substantial interest in this proceeding on behalf of our members who are customers of (“Idaho Power” or “Company”). As Idaho’s largest state-based conservation organization, we have approximately 11,000 members, many of whom are customers of Idaho Power. ICL represents its organizational interest, the interests of its members generally, and those who are customers within the Company’s service territory. Additionally, ICL’s Boise office is an Idaho Power customer. As a result, ICL and its members have a direct and substantial interest in ensuring that the Company provides fair rates that do not unduly burden customers and those interested in energy efficiency, conservation, and the environmental impacts of the energy system. The Commission has consistently granted ICL’s intervention in dockets on similar grounds. ICL’s intervention will respond directly to the issues raised in this proceeding and will not unduly broaden the scope of the issues or this proceeding.

3. ICL intends to fully participate in this matter as a party. The nature and quality of ICL’s intervention in this 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. If available, ICL intends to seek intervenor funding pursuant to IDAPA 31.01.01.161-165.

WHEREFORE, the Idaho Conservation League respectfully request the Commission grant this petition.

DATED this 22d day of February, 2023.

Respectfully submitted,

/s/ Marie Callaway Kellner  
Marie Callaway Kellner (ISB No. 8470)  
Attorney for Idaho Conservation League

## CERTIFICATE OF SERVICE

I hereby certify that on this 22d day of February, 2023, I delivered true and correct copies of the foregoing PETITION TO INTERVENE to the following persons via email, pursuant to PUC Order 35058:

/s/ Marie Callaway Kellner  
Marie Callaway Kellner (ISB No. 8470)  
Attorney for Idaho Conservation League

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