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Attorney for the Idaho Conservation League

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER IDAHO POWER)	
COMPANY’S APPLICATION FOR)	
AUTHORITY TO IMPLEMENT)	CASE NO. IPC-E-23-14
CHANGES TO THE COMPENSATION)	
STRUCTURE APPLICABLE TO)	PETITION TO INTERVENE
CUSTOMER ON-SITE GENERATION)	
UNDER SCHEDULES 6, 8, AND 84 AND)	IDAHO CONSERVATION LEAGUE
TO ESTABLISH AN EXPORT CREDIT)	
RATE METHODOLOGY)	

COMES NOW the Idaho Conservation League (“ICL”) and hereby requests leave to intervene in the above captioned matter to 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 Callaway Kellner
Attorney for the Idaho Conservation League
710 N. 6th St.
Boise, Idaho 83702
Phone: (208) 537-7993
Email: mkellner@idahoconservation.org

Please provide copies of all pleadings, production requests, production responses, Commission orders, and other documents to the names and addresses above. Please provide the same documents to the following:

Brad Heusinkveld
Idaho Conservation League, Energy Associate
710 N. 6th St.
Boise, Idaho 83702
Phone: (208) 340-4423
Email: bheusinkveld@idahoconservation.org

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 Idaho Public Utilities Commission Rule 31.01.01.063.02-03. ICL reserves the right to request hard copies of papers and documents, as may be necessary with appropriate notice and time.

2. Idaho Conservation League claims direct and substantial interest in this proceeding in its organizational capacity and on behalf of our members who are customers of Idaho Power. As Idaho's largest state-based conservation organization, ICL has approximately 11,000 members, many of whom are residential customers of Idaho Power. ICL's Boise headquarters and Ketchum office are respectively Idaho Power Schedule 84 and Schedule 7 customers. Many ICL members are customer generators, or interested in becoming customer generators. ICL intervened in forgoing dockets on Idaho Power net metering and distributed generation policy in pursuit of its organizational goal of electric grid de-carbonization. As a result, ICL and its represented members claim a direct and substantial interest in ensuring Idaho Power provides a fair compensation rate for exported solar and maintains policies that do not unduly burden distributed energy customers. ICL's intervention will respond directly to the issues raised in Idaho Power's application and will not unduly broaden the scope of this docket.

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, we 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, the Idaho Conservation League respectfully requests the Commission grant this petition.

DATED this 8th of May 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 8th day of May, 2023, I delivered true and correct copies of the foregoing PETITION TO INTEVENE to the following persons via the method of service noted:

/s/ Marie Callaway Kellner

Marie Callaway Kellner (ISB No. 8470)
Attorney for the Idaho Conservation League
710 N. 6th St.
Boise, Idaho 83702
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Electronic Mail Only (See Order No. 35058):

Idaho Public Utilities Commission

Jan Noriyuki
Commission Secretary
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Idaho Power Company

Lisa Nordstrom
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