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Attorney for Vote Solar

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER
COMPANY'S APPLICATION FOR
AUTHORITY TO IMPLEMENT CHANGES
TO THE COMPENSATION STRUCTURE
APPLICABLE TO CUSTOMER ON-SITE
GENERATION UNDER SCHEDULES 6, 8,
AND 84 AND TO ESTABLISH AN EXPORT
CREDIT RATE METHODOLOGY

CASE NO. IPC-E-23-14

**VOTE SOLAR'S PETITION TO
INTERVENE**

COMES NOW, Vote Solar and pursuant to Rules 71 through 73 of the Rules of Procedure of the Idaho Public Utility Commission (IDAPA 31.01.01.71 – 31.01.01.73), and pursuant to the Application filed on May 1, 2023, and Notice of Application, Notice of Intervention Deadline, Order No. 35790, filed on May 23, 2023, hereby petitions the Idaho Public Utilities Commission ("Commission") for leave to intervene herein and to appear and participate as a party, and as basis therefore states as follows:

1. The name and address of this Intervenor is:

Vote Solar
c/o Kate Bowman, Regulatory Director, Interior West
299 S. Main St. Suite 1300, PMB 93601
Salt Lake City, UT 84111
kbowman@votesolar.org

2. Copies of all pleadings, production requests, production responses, Commission orders, and other documents should be provided to Abigail R. Germaine and Kate Bowman at:

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Vote Solar
c/o Kate Bowman, Regulatory Director, Interior West
299 S. Main St. Suite 1300, PMB 93601
Salt Lake City, UT 84111
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In the interest of reducing costs to all parties, please provide hard copies of pleadings, testimony, and briefs only. All other production requests, responses, notices, Commission orders and other filings may be submitted via electronic mail in accordance with Rule 63 of the Rules of Procedure of the Idaho Public Utility Commission (IDAPA 31.01.01.063).

3. Vote Solar is an independent 501(c)(3) non-profit working to repower the United States with clean energy by making solar power more accessible and affordable. Vote Solar seeks to promote the development of solar at every scale, from distributed roof top solar to large utility-scale plants, and works to foster economic opportunity and promote energy security by making solar a mainstream energy resource. Vote Solar works together with partners in local communities and engages in regulatory proceedings nationwide to implement, maintain, and enhance the policies necessary to build robust solar markets in key states, including Idaho. Vote Solar has over 80,000 members nationally including members in Idaho Power's service territory. Vote Solar has a direct and substantial interest in this proceeding due to the impact to its members served by Idaho Power and to its role advocating for solar energy. Vote Solar has extensive experience with state-level regulatory engagement in over 22 states, particularly related to the topics of clean energy

resources, distributed solar, and rate design to support the adoption of clean and efficient energy technologies. Vote Solar has also participated in Case Nos. IPC-E-17-13, 18-15, 18-16, and 19-15 and has extensive knowledge that will be valuable in examining Idaho Power's request in this Application.

4. Vote Solar has a direct and substantial interest in this matter as an industry advocate for renewable energy resources in the West. Vote Solar, and many of its community partners and represented constituents, may be negatively impacted by Idaho Power Company's proposal to change its on-site, self-generation tariffs, and the structure and design of its on-site generation offering. Many of Vote Solar's constituents are on-site generators and the changes to the Export Credit Rate ("ECR") and other methodologies could have negative impacts on these generators and Idaho Power customers generally.

5. Without the opportunity to intervene herein, Vote Solar would be without any means of participation in this proceeding which may have a negative impact on on-site generation customers. If allowed to intervene, Vote Solar will participate in the proceedings and appear in all matters as may be necessary and appropriate; present evidence; call and examine witnesses; present argument; and otherwise fully participate in these proceedings.

6. Granting Vote Solar's petition to intervene will not unduly broaden the issues, nor will it prejudice any party to this case.

7. This Petition to Intervene is timely filed under Rule 73, IDAPA 31.01.01.073 because it is filed within the twenty-one (21) day deadline to intervene established by Order No. 35790.

8. Vote Solar intends to fully participate in this matter as a party. The nature and quality of Vote Solar's intervention in this proceeding is dependent on the nature and effect of

other evidence in this proceeding. Vote Solar requests that the Commission issue a timely order granting this Petition to Intervene following the seven-day opposition period set forth in IDAPA 31.01.01.075.

WHEREFORE, Vote Solar respectfully requests that this Commission grant this Petition to Intervene.

DATED: June 12, 2023.

ELAM & BURKE, P.A.



Abigail R. Germaine
Attorney for Vote Solar

CERTIFICATE OF SERVICE

I HEREBY certify that I have on this 12th day of June, 2023 served the foregoing Petition to Intervene by electronic mail to the following:

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