

Matthew A. Nykiel (ISB No. 10270)  
710 N. 6<sup>th</sup> St.  
Boise, Idaho 83702  
Phone: (719) 439-5895  
Email: matthew.nykiel@gmail.com

Attorney for the Idaho Conservation League

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

<b>IN THE MATTER OF THE</b>	)	<b>CASE NO. IPC-E-24-11</b>
<b>APPLICATION OF IDAHO POWER</b>	)	
<b>COMPANY FOR A DETERMINATION</b>	)	<b>PETITION TO INTERVENE</b>
<b>OF 2023 DEMAND-SIDE</b>	)	
<b>MANAGEMENT EXPENSES AS</b>	)	<b>IDAHO CONSERVATION LEAGUE</b>
<b>PRUDENTLY INCURRED</b>	)	

COMES NOW the Idaho Conservation League (“ICL”) to hereby request 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:

Matthew Nykiel  
Attorney for Idaho Conservation League  
710 N. 6<sup>th</sup> St.  
Boise, Idaho 83702  
Phone: (719) 439-5895  
Email: matthew.nykiel@gmail.com

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

Brad Heusinkveld  
Idaho Conservation League, Energy Associate  
710 N. 6<sup>th</sup> 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 asks to reserve the right to request hard copies of papers and documents, as may be necessary, with appropriate notice and time.

2. Idaho Conservation League and claims a direct and substantial interest in this proceeding on behalf of our members who are customers of Idaho Power Company ("Idaho Power " or "Company"). ICL represents its organizational interest, the interests of its approximately 11,000 members generally, and those who are customers within the Company's service territory. ICL holds a seat in the Company's Energy Efficiency Advisory Group ("EEAG") which meets quarterly to hear updates and advise on Idaho Power's efficiency and DSM programs. In the EEAG, and by intervention in this proceeding, ICL pursues its interest in reducing carbon emissions and ensuring a well-functioning and flexible energy system. As a result, ICL and its members have a direct and substantial interest in ensuring continued growth and proper management of the Company's DSM and energy efficiency programs The Commission has consistently granted ICL's intervention in Idaho Power dockets on similar grounds.

3. ICL's intervention will respond directly to the issues raised in the Company's application and will not unduly broaden the scope of the issues or this proceeding.

4. ICL intends to 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, ICL respectfully requests the Commission grant this petition.

DATED this 2nd day of May, 2024

Respectfully submitted

*/s/ Matthew A. Nykiel*  
Matthew A. Nykiel (ISB No. 10270)  
Attorney for Idaho Conservation League

## CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of May, 2024, I delivered true and correct copies of the foregoing PETITION TO INTERVENE to the following persons via the method of service noted:

*/s/ Matthew A. Nykiel*

Matthew A. Nykiel (ISB No. 10270)  
Attorney for Idaho Conservation League

### Electronic Mail Only (See Order No. 35058):

*Idaho Public Utilities Commission*  
Monica Barrios-Sanchez  
Commission Secretary  
monica.barriossanchez@puc.idaho.gov  
secretary@puc.idaho.gov

*Commission Staff*  
Adam Triplett  
Deputy Attorney General Idaho Public  
Utilities Commission  
adam.triplett@puc.idaho.gov

*Idaho Power Company*  
Megan Goicoechea Allen  
Lisa Nordstrom  
Attorneys for Idaho Power Company  
P.O. Box 70 Boise, Idaho 83707  
mgoicoecheaallen@idahopower.com  
lnordstrom@idahopower.com  
dockets@idahopower.com

Connie Aschenbrenner  
Zack Thompson  
cashenbrenner@idahopower.com  
zthompson@idahopower.com

*City of Boise*  
Ed Jewell  
Steven Hubble  
150 N. Capital Blvd. P.O. Box 500  
Boise, Idaho 83701-0500  
boisecityattorney@cityofboise.org  
ejewell@cityofboise.org  
shubble@cityofboise.org

*NWEC/SCCAP*  
F. Diego Rivas  
NW Energy Coalition  
811 1st Ave, Suite 305  
Seattle, WA 98104  
diego@nwenergy.org

Ken Robinette  
South Central Community Action  
Partnership 550 Washington Street South  
Twin Falls, ID 83303  
ken@sccap-id.org