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Attorneys for Idaho Clean Energy Association

# **BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF ROCKY MOUNTAIN POWER TO CLOSE THE NET METERING PROGRAM TO NEW SERVICE & IMPLEMENT A NET BILLING PROGRAM TO COMPENSATE CUSTOMER GENERATORS FOR EXPORTED GENERATION

## Case No. PAC-E-19-18 08

IDAHO CLEAN ENERGY ASSOCIATION'S PETITION TO INTERVENE

Idaho Clean Energy Association, Inc. ("ICEA"), petitions the Commission for leave to

intervene in this case pursuant to Rule 71, IDAPA 31.01.01.71.

## Intervention

1. The name and address of the intervenor is:

Idaho Clean Energy Association, Inc. P.O. Box 2264 Boise, Idaho 83701



Please provide copies of all pleadings, production requests, production responses,
Commission orders and other documents as follows:

Preston N. Carter Givens Pursley LLP 601 West Bannock Street Boise, Idaho 83702 Email: prestoncarter@givenspursley.com kendrah@givenspursley.com

3. This Intervenor, ICEA, is a nonprofit organization dedicated to the advancement of renewable energy, energy efficiency and their associated technologies in the State of Idaho. Its members currently sell products that are subject to the schedules at issue in this matter. Therefore, ICEA claims a direct and substantial interest in this proceeding in that the prices its members receive for electrical sales and costs they pay to Rocky Mountain Power may be affected by the outcome of this proceeding.

4. ICEA intends to participate herein as a party and, if necessary, to introduce evidence, cross-examine witnesses, call and examine witnesses, and be heard in argument. The nature and quality of evidence which this Intervenor will introduce is dependent upon the nature and effect of other evidence in this proceeding.

5. Without the opportunity to intervene herein, this Intervenor would be without any means of participation in this proceeding, which may have a material impact on the prices it receives for electric sales and costs it pays to Rocky Mountain Power.

For these reasons, ICEA respectfully requests:

1. That the Commission grant its Petition to Intervene in this case and that ICEA be entitled to appear and participate as a party; and

2. That the Commission order any other such relief as the Commission considers just and reasonable.

Dated: August 8, 2019.

#### GIVENS PURSLEY LLP

Preston N. Carter Givens Pursley LLP Attorneys for Idaho Clean Energy Association, Inc.

# **CERTIFICATE OF SERVICE**

I certify that on August 7, 2019, a true and correct copy of IDAHO CLEAN ENERGY ASSOCIATION'S PETITION TO INTERVENE was served upon all parties of record in this proceeding via the manner indicated below:

#### **Commission Staff**

Diane Hanian, Commission Secretary Idaho Public Utilities Commission 472 West Washington Street Boise, ID 83702 <u>Diane.holt@puc.idaho.gov</u> (Original and 7 copies provided)

### **Hand Delivery**

### Via Electronic Mail

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