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 Community Action Partnership
 Association of Idaho

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 IDAHO PUBLIC
 UTILITIES COMMISSION

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF ROCKY MOUNTAIN)	CASE NOS. PAC-E-21-07
POWER'S APPLICATION FOR)	
AUTHORITY TO INCREASE ITS RATES)	
IN CHARGES IN IDAHO AND APPROVAL)	COMMUNITY ACTION
OF PROPOSED ELECTRIC SERVICE)	PARTNERSHIP ASSOCIATION
SCHEDULES AND REGULATIONS)	OF IDAHO'S PETITION TO
)	TO INTERVENE
)	

COMES NOW, Community Action Partnership Association of Idaho (hereinafter "CAPAI" or "Intervenor") and, pursuant to Rules 071-076 of the Commission's Rules of Practice and Procedure, IDAPA 31.01.01.071-076, hereby petitions the Commission for leave to intervene in this proceeding and to appear and participate with full party's rights. In support of this Petition, CAPAI states as follows:

1. The address and name of the Petitioner is:

Community Action Partnership Association of Idaho
 3350 W. Americana Terrace, Suite 360
 Boise, ID. 83706
2. CAPAI will be represented in this proceeding by, and pleadings and other correspondence need only be sent to:

Brad M. Purdy
Attorney at Law
2019 N. 17th St.
Boise, ID. 83702
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Email: bmpurdy@hotmail.com

3. CAPAI is a non-profit organization consisting of eight (8) community action partnership agencies (CAPs) serving every county in Idaho fighting the causes and conditions of poverty through building the capacity and effectiveness of its members who have a direct and substantial interest in this proceeding. The following are CAP members: Community Action Partnership (“CAP”-Lewiston); El-Ada CAP (“El-Ada”-greater Boise area as well as Elmore and Owyhee counties); Metro Community Services (“MCS”-Caldwell); South Central CAP (“SCCAP”-Twin Falls); Community Council of Idaho (“CCI”-Caldwell); Southeastern Idaho Community Action Agency (“SEICAAP”-Pocatello); Eastern Idaho CAP (“EICAP”-Idaho Falls), and; Western Idaho CAP (“Wi-Cap”-Payette). CAPAI serves as the umbrella organization for all of the CAPs providing numerous means of support including, but not limited to, representing the CAPs before the IPUC. The causes and conditions of poverty are numerous and disparate and include increasing utility rates such as those for Rocky Mountain’s low income rate payers. The two CAP agencies that serve Rocky Mountain Power customers in Idaho include EICAP and SEICAAP.

Low income families pay a higher percentage of their income for utility expenses than those in other economic categories. For roughly the past twenty (20) years, CAPAI has essentially been the only party who regularly intervenes in proceedings before the Commission specifically representing public utilities’ low-income customers and advocating on behalf of those customers in a myriad of ways. Among other things, CAPAI oversees Rocky Mountain’s Low-Income Weatherization Assistance (LIWA) program for the Company’s low-income

customers which, among other things, reduces the electricity consumption, and thereby the bills, of customers who qualify for and participate in the LIWA program. Thus, CAPAI's participation in cases before the Commission pertains to a specific program, regulated by the Commission and designed to reduce energy consumption by those least able to pay their bills. CAPAI's involvement in cases before the IPUC is not limited to the funding of energy conservation programs. CAPAI also frequently takes a position on rate design, customer service quality, cost of service and many other aspects of a typical rate case.

CAPAI's weatherization programs provide not only a much-needed benefit to those least able to pay their electric bills by reducing electric consumption through weatherization, but also enhance the comfort and safety of the programs' participants. CAPAI'S low-income weatherization programs are recognized and approved by the U.S. Department of Health and Human Services. Funding for the programs is passed through the Idaho Department of Health and Welfare who also monitors the programs and their funding levels, as well as numerous other aspects of CAPAI and its member agencies. In addition to the aforementioned oversight and monitoring by state and federal agencies, the low-income weatherization programs are also subject to scrutiny as to their effectiveness by the Idaho Public Utilities Commission. Thus, the low-income programs operated by the CAPs, are very specific and regulated by numerous governmental agencies, including the Commission.

CAPAI has been involved in a considerable number of Rocky Mountain proceedings before this Commission widely ranging in scope over a number of years. CAPAI staff works with and provides administrative support to the CAPs on a regular basis for many reasons such as implementation and auditing of the Company's low-income weatherization programs. CAPAI also represents the CAPs before the Idaho Public Utilities and has done so effectively for more


than twenty years. Furthermore, the services provided by CAPAI not only assist the poor by helping to reduce their utility bills, but provide benefits to all of Rocky Mountain's ratepayers by reducing energy consumption and the amount of bad debt incurred due to inability to pay; said debt which is ultimately passed through to other ratepayers. Thus, if granted intervention in this case, CAPAI will address a variety of issues of importance to the general body of Rocky Mountain's ratepayers.

CAPAI believes that it will fulfill an important role in this proceeding if given the opportunity to participate as a party. Consequently, it is fair to say that CAPAI has a direct and substantial interest in the subject matter of this proceeding and its intervention will not unduly broaden the issues presented by Rocky Mountain's Application.

4. CAPAI respectfully requests the right to participate in this proceeding and introduce testimony and exhibits, cross-examine other parties' witnesses and provide its own, engage in oral argument and written briefing, file comments, and otherwise fully participate as a party.

WHEREFORE, the Community Action Partnership Association of Idaho hereby requests that this Commission grant its Petition to Intervene in this proceeding and to fully appear and participate as a party with all the rights and responsibilities as such.

DATED, this 8th day of July, 2021.


Brad M. Purdy
Attorney for the Community Action Partnership
Association of Idaho

CERTIFICATE OF SERVICE

I, the undersigned, hereby represent that on this 8th day of July, 2021, caused a true and correct copy of this Petition to Intervene to be served on the following:

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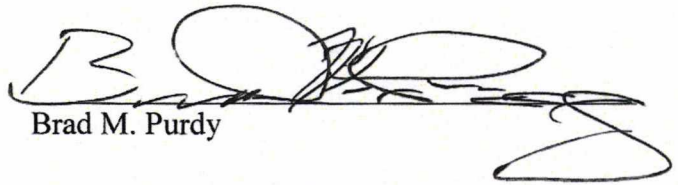
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DATED, this 8th day of July, 2021

A handwritten signature in black ink, appearing to read "Brad M. Purdy", with a large, stylized flourish extending to the right.

Brad M. Purdy