

Benjamin J. Otto (ISB No. 8292)
710 N 6th Street
Boise, ID 83701
Ph: (208) 345-6933 x 112
botto@idahoconservation.org

RECEIVED
2021 JUN 29 PM 3: 37
IDAHO PUBLIC
UTILITIES COMMISSION

Attorney for the Idaho Conservation League

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE)	
APPLICATION OF ROCKY)	
MOUNTAIN POWER FOR)	CASE NO. PAC-E-21-07
AUTHORITY TO INCREASE ITS)	
RATES AND CHARGES IN IDAHO)	
AND APROVAL OF PROPOSED)	PETITION TO INTERVENE OF THE
ELETRIC SERVICE SCHEDULES)	IDAHO CONSERVATION LEAGUE
AND REGULATIONS)	

The Idaho Conservation League (“ICL”) hereby petitions 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:

Benjamin J. Otto
Idaho Conservation League
710 N. 6th st.
Boise, Idaho 83702
Ph: (208) 345-6933 x 112
botto@idahoconservation.org

Please provide copies of all pleadings, production requests, production responses, Commission orders, and other documents to the name and address above. In the interest of conserving natural resources and reducing the costs to all parties, please provide hard copies of pleadings, testimony, and briefs only. Production requests, responses, notices, Commission orders, and other filings may be submitted via electronic mail in accordance with IPUC Rules 31.01.01.063.02-03.

2. The Idaho Conservation League has a direct and substantial interest in this matter due to our longstanding engagement in Idaho electricity regulation and our approximately 20 members who are residential customers of Rocky Mountain Power. This Commission has consistently granted ICL's Intervention in Rocky Mountain Power dockets so that we can represent the interests of our members, and our organizational interest, in assuring utility maintains adequate service, as defined in Idaho Code 61-302, and, utility rates are just and reasonable as required by Idaho Code 61-301. ICL will respond to RMP's proposal and thus our intervention here will not unduly broaden the issues raised by RMP's Application.

3. ICL intends to fully participate in this matter as a party. The nature and quality of ICL's intervention in the proceeding is dependant upon the nature and effect of other evidence in this proceeding. If necessary ICL 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 29th day of June 2021.

Respectfully submitted,

/s/ Benjamin J Otto
Idaho Conservation League

CERTIFICATE OF SERVICE

I certify that on the 29th day of June 2021, I delivered true and correct copies of the foregoing PETITION TO INTERVENE to the following via the service method noted:

/s/ Benjamin J Otto
Idaho Conservation League

Electronic Mail only:
Idaho Public Utilities Commission
Jan Noriyuki
Commission Secretary
secretary@puc.idaho.gov

Rocky Mountain Power
Ted Weston
Emily Wegner
Mathew D. McVee
Rocky Mountain Power
ted.weston@pacificorp.com
Emily.wegner@pacificorp.com
Mathew.mcvee@pacificorp.com

Idaho Irrigation Pumpers Association
Eric L. Olsen
ECHO HAWK & OLSEN, PLLC
elo@echohawk.com

Anthony Yankel
tony@yankel.net

Bayer Corporation
Randall C. Budge
Thomas J. Budge
Racine Olson, PLLP
randy@racineolson.com
tj@racineolsen.com

James R. Smith
Mike Veile
P4 Production, L.L.C.
Jim.r.smith@icloud.com
Mike.veile@bayer.com

Pacificorp Idaho Industrial Customers
Ronald L. Williams
Williams Bradbury, P.C.
ron@williamsbradbury.com

Bradley Mullins
MW Analytics, Energy & Utilities
brmullins@mwanalytics.com

Val Steiner
Itafos Conda, LLC
Val.steiner@itafos.com

Kyle Williams
BYU Idaho
williamsk@byui.edu

Adam Gardner
Idahoan Foods
AGardener@idahoan.com