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IDAHO PUBLIC
UTILITIES COMMISSION

Attorney for the Idaho Conservation League

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF ROCKY)	
MOUNTAIN)	CASE NO. PAC-E-21-19
POWER'S FILING FOR)	
ACKNOWLEDGEMENT OF ITS 2021)	PETITION TO INTERVENE OF THE
INTEGRATED RESOURCE PLAN)	IDAHO CONSERVATION LEAGUE
)	

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) 286-4452
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 resource plans set forth a least risk and least cost portfolio of demand and supply side resources to maintain adequate service, as defined in Idaho Code 61-302. ICL will respond to RMP's 2021 Integrated Resource Plan 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 15th day of November 2021.

Respectfully submitted,

/s/ Benjamin J Otto
Idaho Conservation League

CERTIFICATE OF SERVICE

I certify that on the 15th day of November 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

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