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IDAHO PUBLIC
UTILITIES COMMISSION

Attorney for the Idaho Conservation League

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE)	CASE NO. PAC-E-22-15
APPLICATION OF ROCKY)	
MOUNTIAN POWER FOR THE)	PETITION TO INTERVENE
AUTHORITY TO IMPLEMENT)	
THE RESIDENTIAL RATE)	IDAHO CONSERVATION LEAGUE
MODERNIZATION PLAN)	AND NW ENERGY COALITION

COMES NOW the Idaho Conservation League (“ICL”) and the NW Energy Coalition (“NVEC”) and hereby requests leave to intervene in the above captioned matter to pursuant to the Idaho Public Utilities Commission Rules of Procedure, IDAPA 31.01.01.071-073. This petition is accompanied by a MOTION FOR LIMITED ADMISSION PRO HAC VICE for F. Diego Rivas, attorney for NVEC. As discussed below, ICL and NVEC have direct and substantial interests in these proceedings, and therefore should be granted intervention.

1. The name of this intervenor is:

Marie Callaway Kellner
Attorney for the Idaho Conservation League
710 N. 6th St.
Boise, Idaho 83702
Phone: (208) 537-7993
Email: mkellner@idahoconservation.org

F. Diego Rivas
Attorney for the NW Energy Coalition
1101 8th Ave
Helena, MT 59601
Phone: (406) 461-6632
Email: diego@nwenergy.org

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

Brad Heusinkveld
Idaho Conservation League, Energy Associate
710 N. 6th 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 NW Energy Coalition claim a direct and substantial interest in this proceeding on behalf of our members who are customers of Rocky Mountain Power, a division of PacifiCorp (“Rocky Mountain Power” or “Company”). As Idaho’s largest state-based conservation organization, ICL has approximately 11,000 members, many of whom are residential customers of Rocky Mountain Power. ICL represents its organizational interest, the interests of its members generally, and those who are Residential Service Schedule 1 customers and Electric Service Schedule 36 customers within the Company’s service territory. NWECA has over 100 organizational members throughout Idaho, Montana, Washington, and

Oregon. NWECL claims an interest in this case on behalf of its eleven organizational members in Idaho. As a result, ICL and NWECL and their members have a direct and substantial interest in ensuring that Rocky Mountain Power provides a fair rate structure that does not unduly burden residential and small commercial customers, and those interested in energy savings and conservation. The Commission has consistently granted ICL's intervention in Rocky Mountain Power dockets on similar grounds. The NWECL has also intervened in other utility dockets in Idaho on these grounds. ICL and NWECL'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. ICL and NWECL intervene jointly to avoid duplicative participation in this docket.

3. ICL and NWECL intend to fully participate in this matter as parties. The nature and quality of ICL and NWECL'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 and NWECL may seek intervenor funding pursuant to IDAPA 31.01.01.161-165.

WHEREFORE, ICL and NWECL respectfully request the Commission grant this petition.

DATED this 21st day of December, 2022.

Respectfully submitted

/s/ Marie Callaway Kellner

Marie Callaway Kellner (ISB No. 8470)
Attorney for Idaho Conservation League

CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of December, 2022, I delivered true and correct copies of the foregoing PETITION TO INTEVENE to the following persons via the method of service noted:

/s/ Marie Callaway Kellner

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Electronic Mail Only (See Order No. 35058):

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