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Attorney for the Idaho Conservation League

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

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|-----------------------------------|---|----------------------------------|
| IN THE MATTER OF THE |) | |
| APPLICATION OF ROCKY |) | CASE NO. PAC-E-24-04 |
| MOUNTAIN POWER FOR |) | |
| AUTHORITY TO INCREASE ITS |) | PETITION TO INTERVENE |
| RATES AND CHARGES IN IDAHO |) | |
| AND APPROVAL OF PROPOSED |) | IDAHO CONSERVATION LEAGUE |
| ELECTRIC SERVICE SCHEDULES |) | |
| AND REGULATIONS |) | |

COMES NOW the Idaho Conservation League (“ICL”) to hereby request leave 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:

Matthew Nykiel
Attorney for Idaho Conservation League
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Phone: (719) 439-5895
Email: matthew.nykiel@gmail.com

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

Brad Heusinkveld
Idaho Conservation League
Regulatory Counsel
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 claims a direct and substantial interest in this proceeding on behalf of our members who are customers of PacifiCorp, dba Rocky Mountain Power (“Rocky Mountain Power ” or “Company”). ICL represents its organizational interest, the interests of its approximately 11,000 members generally, and those who are customers within the Company’s service territory. ICL is party to the PacifiCorp MultiState Protocol (“MSP”) and has participated in numerous conversations regarding the Company’s insurance and catastrophic fire funds requested in this filing. The Company’s proposals are relevant to ICL’s interests in utility operation and also our longstanding engagement on lands in Idaho. The Commission has consistently granted ICL’s intervention in Idaho Power dockets on similar grounds.

3. ICL’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.

4. ICL intends to participate in this matter as a party. The nature and quality of ICL’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 may seek intervenor funding pursuant to IDAPA 31.01.01.161-165.

WHEREFORE, ICL respectfully requests the Commission grant this petition.

DATED this 12th day of June, 2024

Respectfully submitted

/s/ Matthew A. Nykiel
Matthew A. Nykiel (ISB No. 10270)
Attorney for Idaho Conservation League

CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of June, 2024, I delivered true and correct copies of the foregoing PETITION TO INTERVENE to the following persons via the method of service noted:

/s/ Matthew A. Nykiel

Matthew A. Nykiel (ISB No. 10270)
Attorney for Idaho Conservation League

Electronic Mail Only (See Order No. 35058):

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