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IDAHO PUBLIC
UTILITIES COMMISSION

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE JOINT)	CASE NOS. AVU-E-17-09
APPLICATION OF HYDRO ONE LIMITED)	AVU-G-17-05
AND AVISTA CORPORATION FOR)	
APPROVAL OF MERGER AGREEMENT)	COMMUNITY ACTION
ELECTRIC SERVICE IN IDAHO)	PARTNERSHIP ASSOCIATION
)	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
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2019 N. 17th St.
Boise, ID. 83702
208-384-1299
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3. CAPAI is a non-profit corporation consisting of six community action agencies serving every county in Idaho and also includes, among others, the statewide Community Council of Idaho and fights 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. These causes and conditions of poverty are numerous and disparate and include increasing utility rates such as those for AVISTA Corporation's low income rate payers.

Low income families pay a higher percentage of their income for utility expenses than those in other economic categories. CAPAI is typically the only party who intervenes in proceedings before the Commission specifically representing public utilities' low-income customers. In particular, CAPAI has been involved in a considerable number of AVISTA proceedings before this Commission widely ranging in scope in recent years. CAPAI staff works with the utility on a regular basis for many reasons and to address a wide variety of issues ranging from rate design and revenue requirement to low income programs such as the Company's LIWA weatherization program. If granted intervention in this case, CAPAI will address a variety of issues of importance to the general body of ratepayers.

The case at hand is somewhat unique and certainly significant for all of Avista's ratepayers, including low income. CAPAI submits that it will enhance the Commission's understanding of how the proposed merger might affect the interests of the poor, both positively and negatively. In its initial filing, Avista indicated that there will be synergies resulting from

the benefits of which would inure to ratepayers. In addition, Avista has asserted that, due to the different cultural climate in which Hydro One exists, there might be made available to the Company's Idaho customers additional funding that would enhance the combined entity's ability to address issues of social concern, perhaps including low income weatherization, conservation education, and possibly the development of additional programs.

CAPAI intends to examine these possibilities and, as the primary low income advocate appearing before the Idaho Commission, is in a favorable position to provide educated input regarding low income interests and the interests of majority of Avista's Idaho ratepayers.

Based on the foregoing, CAPAI believes that it would fulfill an important role in this proceeding if given the opportunity to participate as a party. Consequently, CAPAI respectfully submits that it has a direct and substantial interest in the subject matter of this proceeding and its intervention will not unduly broaden the issues presented by AVISTA's and Hydro One's Application.

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

WHEREFORE, the Community Action Partnership Association of Idaho hereby requests that the 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 26th day of October, 2017.


Brad M. Purdy
Attorney for CAPAI

CERTIFICATE OF SERVICE

I, the undersigned, hereby represent that on this 26th day of October, 2017, caused a true and correct copy of this Petition to Intervene to be served on the following electronically (unless otherwise indicated).

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DATED, this 26th day of October, 2017



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