

**BEFORE THE
IDAHO UTILITIES AND TRANSPORTATION COMMISSION**

IN THE MATTER OF THE JOINT) CASE NOS. AVU-E-17-09
APPLICATION OF))
))
HYDRO ONE LIMITED AND))
AVISTA CORPORATION))
))
FOR APPROVAL OF MERGER) WASHINGTON AND NORTHERN
AGREEMENT.) IDAHO DISTRICT COUNCIL OF
) LABORERS' PETITION TO
) INTERVENE

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IDAHO PUBLIC UTILITIES COMMISSION

1. Pursuant to Rules of Procedure 71 through 75 of the Idaho Public Utilities Commission, IDAPA 31.01.01.071-.075, the Washington and Northern Idaho District Council of Laborers' ("WNIDCL") hereby petitions the Idaho Utilities and Transportation Commission ("IUTC" or "Commission") for leave to intervene in the above-captioned proceeding as an intervenor with full party status, as described in Rule 36. The business address of WNIDCL is:

Washington and Northern Idaho District Council of Laborers
P.O. Box 12917
Mill Creek, WA 98082-3556.

2. Danielle Franco-Malone of Schwerin Campbell Barnard Iglitzin and Lavitt, LLP will represent WNIDCL in this proceeding and has an application for pro hac vice pending. All documents relating to this proceeding should be served on WNIDCL's attorney at the following address:

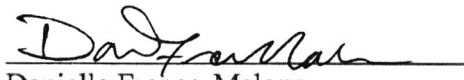
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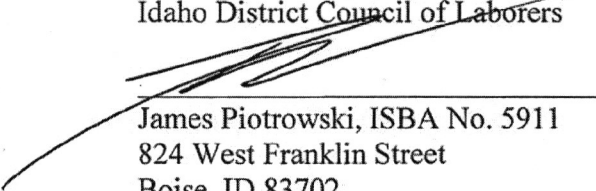
3. WNIDCL is a democratic labor organization that represents more than 10,750 members in Washington and Northern Idaho. Petitioner is an affiliate of the Laborers International Union of North America (“LIUNA”), which represents 500,000 members primarily employed in the construction industry, and is the eighth largest labor organization in the United States.
5. WNIDCL’s members have a substantial interest in Hydro and Avista’s proposed merger filed on September 14, 2017. Hydro and Avista’s proposed merger would substantially and directly affect approximately 100 WNIDCL members who perform work for construction contractors working on the Avista system, including NPL, Loy Clark Pipeline, Northstar Enterprises, Spokane Traffic Control, Max J Kuney, and Garco. Petitioner’s members work on numerous Avista construction projects in Idaho.
6. As the bargaining representative of members employed by certain Avista construction contractors, WNIDCL’s intervention serves the public interest as well as the interests of its members. Petitioner and its members can provide relevant and necessary information related to its interests in the proceeding, including the training requirements, construction standards, local employment impacts, and workforce development investments. Petitioner’s members perform work “in the field” and can provide information with direct bearing on the safety and reliability of the service to the consumer. No other party can represent the interests of WNIDCL.
7. WNIDCL and its members have a direct and substantial interest in this proceeding that will not be adequately represented by any other party, and may be affected by any Commission determination made in connection with this proceeding. Petitioner has an interest in ensuring that the proposed merger WNIDCL’s participation will not unreasonably broaden the issues or

burden the record in this proceeding. Thus, it is in the public interest to allow WNIDCL to intervene in this proceeding.

8. WNIDCL respectfully petitions the Commission for leave to intervene in this proceeding to represent its members who would be affected by the merger of Hydro and Avista.

DATED this 26th day of October, 2017.


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CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of October, 2017, I caused a copy of the foregoing Washington and Northern Idaho District Council of Laborer's Petition to Intervene to be emailed to the following:

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