

Benjamin J. Otto (ISB No. 8292)
710 N 6th Street
Boise, ID 83701
Ph: (208) 345-6933 x 12
Fax: (208) 344-0344
botto@idahoconservation.org

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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. AVU-E-19-06
APPLICATION OF AVISTA)	CASE NO. AVU-E-19-03
CORPORATION FOR THE)	
EXTENSION OF AVISTA'S ELECTRIC)	PETITION TO INTERVENE OF THE
AND NATURAL GAS FIXED COST)	IDAHO CONSERVATION LEAGUE
ADJUSTMENT MECHANISMS IN THE)	
STATE OF IDAHO)	

The Idaho Conservation League ("ICL") requests 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:

Benjamin J. Otto
Idaho Conservation League
710 N. 6th st.
Boise, Idaho 83702
Ph: (208) 345-6933 x 12
Fax: (208) 344-0344
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. Idaho Conservation League claims a direct and substantial interest in this proceeding arising from the impact to its members served by Avista and to its long-term role advocating for public values. As Idaho's largest state-based conservation organization, we have approximately 1,000 members who are residential customers of Avista. ICL's Sandpoint Idaho office is a small

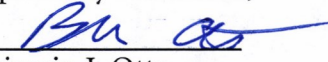
commercial customer of Avista. ICL as an organization, and on behalf of our members who are Avista customers, has a direct and substantial interest in maintaining rate mechanisms that support Avista's pursuit of all cost-effective energy conservation. ICL brings a unique and valuable perspective to this proceeding by virtue of years-long engagement, on behalf of the residential and small commercial customers we represent, in the negotiations and settlements that led to the adoption and continuation of the Fixed Cost Adjustment mechanism. By responding to Avista's requests to extend the FCA mechanism, ICL's intervention will not unduly broaden the issues in this proceeding.

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 intends to seek intervenor funding pursuant to IDAPA 31.01.01.161-165.

WHEREFORE, ICL respectfully requests the Commission grant this petition.

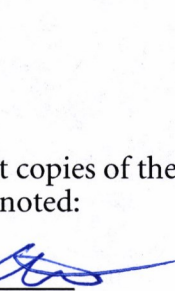
DATED this 17th day of July, 2019.

Respectfully submitted,


Benjamin J. Otto
Idaho Conservation League

CERTIFICATE OF SERVICE

I certify that on the 17th day of July, 2019, I delivered true and correct copies of the foregoing PETITION TO INTERVENE to the following via the service method noted:


Benjamin J. Otto
Idaho Conservation League

Hand delivery:

Diane Hanian
Commission Secretary (Original and
seven copies provided)
Idaho Public Utilities Commission
427 W. Washington St.
Boise, ID 83702-5983

Electronic Mail only:

Avista Utilities
David J. Meyer, Esq.
Patrick D. Erhbar
Avista Corporation
David.meyer@avistacorp.com
Pat.Erhbar@avistacorp.com
AvistaDockets@avistacorp.com