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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)	
APPLICATION OF AVISTA)	CASE NO. AVU-E-21-01
CORPORATION FOR THE)	CASE NO: AVU-G-21-01
AUTHORITY TO INCREASE ITS)	
RATES AND CHARGES FOR)	
ELECTRIC AND NATURAL GAS)	PETITION TO INTERVENE OF THE
CUSTOMERS IN THE STATE OF)	IDAHO CONSERVATION LEAGUE
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:

Idaho Conservation League
Benjamin J. Otto – Attorney
Dainee Gibson-Webb – Technical Expert
710 N. 6th st.
Boise, Idaho 83702
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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, both electric and gas. 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, have a direct and substantial interest in ensuring prudent capital investments and operational spending by Avista along with fair, just, and reasonable utility rates for customers. ICL brings a unique and valuable perspective to this proceeding by virtue of our focus on highlighting the full costs and future risks of spending on fossil fueled generation resources. By responding to Avista's requests for additional revenues and rate changes 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 February, 2021.

Respectfully submitted,

Benjamin J. Otto
Idaho Conservation League

CERTIFICATE OF SERVICE

I certify that on the 17th day of February, 2021, I served the foregoing PETITION TO INTERVENE, by emailing a copy thereof, in accordance with Idaho Public Utilities Commission Order No. 34602, to the following:

/s/ Benjamin Otto

Electronic Mail only:

Idaho Public Utilities Commission

Jan Noriyuki
Commission Secretary
secretary@puc.idaho.gov
jan.noriyuki@puc.idaho.gov

John Hammond
Deputy Attorney General
john.hammond@puc.idaho.gov

Avista Utilities

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