

DEC 18 2019

Boise, Idaho

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Attorney for the Idaho Conservation League

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

**IN THE MATTER OF
INTERMOUNTAIN GAS COMPANY's
2019-2023 INTEGRATED RESOURCE
PLAN**

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**CASE NO. INT-G-19-07
PETITION TO INTERVENE
IDAHO CONSERVATION LEAGUE**

COMES NOW the Idaho Conservation League ("ICL") and hereby 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 a direct and substantial interests in these proceedings, and therefore should be granted intervention.

1. The name of this intervenor is:

Benjamin J. Otto
Matt Nykiel
Idaho Conservation League
710 N. 6th st.
Boise, Idaho 83702
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Please provide copies of all documents in this proceeding to the names and addresses 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. The Idaho Conservation League claims a direct and substantial interest in this proceeding as a customer, on behalf our members served by Intermountain Gas, and based on our long-term role advocating for public values. ICL's Boise headquarters is a customer of Intermountain Gas. As Idaho's largest state-based conservation organization, ICL has approximately 11,000 members, about half of which are customers of Intermountain Gas. ICL has a direct and substantial interest in ensuring Intermountain's long-term resource plan

develops a least cost, least risk portfolio of options that takes full advantage of demand-side measures before building additional supply-side capacity. We have a further interest in ensuring Intermountain Gas engages with all types of customers instead of relying primarily on employees of economic development associations for planning advice. Because the Idaho Commission has directed all utilities, when developing long-term plans, to rely on meaningful public participation and to pursue all cost-effective conservation measures before pursuing supply-side options, ICL's our intervention will not unduly broaden the issues.

3. ICL intends to fully participate in this matter as a party. The nature and quality of our intervention in the proceeding is dependant upon the nature and effect of other evidence in this proceeding. If necessary, we may seek discovery, 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.

Respectfully submitted this 18th day of December 2019,



Benjamin J. Otto
Idaho Conservation League

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of December 2019 I delivered true and correct copies of the foregoing PETITION TO INTERVENE to the following persons via the method of service noted:



Benjamin J. Otto

Mail
~~Hand~~ delivery:

Idaho Public Utilities Commission
Diane Hanian
Commission Secretary
Idaho Public Utilities Commission
11331 W. Chinden Blvd.
Building 8, Suite 201-A
Boise, ID 83714
(Original + 7 copies provided)

Electronic Mail:

Intermountain Gas Company
Preston N. Carter
Givens Pursley LLP
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Lori A. Blattner
Director - Regulatory Affairs
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