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Attorney for the Idaho Conservation League

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE)	
APPLICATION OF)	
INTERMOUNTAIN GAS COMPANY)	CASE NO. IMT-G-20-04
FOR AUTHORITY TO IMPLEMENT)	
A COMMERCIAL ENERGY)	PETITION TO INTERVENE OF THE
EFFICIENCY PROGRAM AND)	IDAHO CONSERVATION LEAGUE
FUNDING MECHANISM)	

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 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
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Fax: (208) 344-0344
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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 Intermountain Gas and to its long-term role advocating for public values. As Idaho's largest state-based conservation organization, we have approximately 11,000 members who are residential customers of Intermountain. ICL's Boise office is commercial customer of Intermountain Gas. As such, ICL and our members have a direct interest in this proceeding to ensure customer dollars are invested in cost-effective gas conservation programs that deliver verifiable and durable savings. ICL brings a unique and valuable perspective to this proceeding due to our long-standing engagement in utility sponsored conservation program that benefit all utility customers, including advocating for a commercial gas conservation program in Intermountain's 2016 General Rate Case. Because this Commission has directed all utilities to pursue all cost-effective conservation measures, 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.

Respectfully submitted this 17th day of September 2020.

/s/ Benjamin J Otto
Idaho Conservation League

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of September, 2020, I delivered true and correct copies of the foregoing PETITION TO INTERVENE to the following persons via the method of service noted:

Electronic Mail (see Order 34781):

Idaho Public Utilities Commission
Jan Noriyuki, Commission Secretary
jan.noriyuki@puc.idaho.gov

Intermountain Gas Company
Lori A Blattner, Director – Regulatory Affairs
Lori.Blattner@intgas.com

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/s/ Benjamin J Otto
Idaho Conservation League