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IDAHO PUBLIC
UTILITIES COMMISSION

Attorney for the Idaho Conservation League

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF)	CASE NO. INT-G-22-07
INTERMOUNTIAN GAS)	
COMPANY'S APPLICATION FOR)	IDAHO CONSERVATION LEAGUE
AUTHORITY TO INCREASE ITS)	
RATES AND CHARGES FOR)	PETITION TO INTERVENE
NATURAL GAS SERCVICE IN)	
THE STATE OF IDAHO)	

COMES NOW the Idaho Conservation League ("ICL") and hereby requests leave to intervene in the above captioned matter to 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:

Marie Callaway Kellner
Attorney for the Idaho Conservation League
710 N. 6th St.
Boise, Idaho 83702
Phone: (208) 537-7993
Email: mkellner@idahoconservation.org

Please provide copies of all pleadings, production requests, production responses, Commission orders, and other documents the name and address above. Please provide the same documents to the following:

Brad Heusinkveld
Idaho Conservation League, Energy Associate
710 N. 6th St.
Boise, Idaho 83702
Phone: (208) 340-4423
Email: bheusinkveld@idahoconservation.org

In the interest of reducing costs to all parties, pleadings, testimony, briefs, production requests, responses, notices, Commission orders, and other filings may be submitted via electronic mail in accordance with Idaho Public Utilities Commission Rule 31.01.01.063.02-03. ICL asks to reserve the right to request hard copies of papers and documents, as may be necessary with appropriate notice and time.

2. Idaho Conservation League claims a direct and substantial interest in this proceeding on behalf of our members who are customers of Intermountain Gas Company (“Intermountain” or “Company”). As Idaho’s largest state-based conservation organization, we have approximately 11,000 members, many of whom are customers of Intermountain Gas. ICL represents its organizational interest, the interests of its members generally, and those who are customers within the Company’s service territory. As a result, ICL and its members have a direct and substantial interest in ensuring that Intermountain provides fair rates that do not unduly burden customers and those interested in energy efficiency, conservation and the environmental impacts of the energy system. The Commission has consistently granted ICL’s intervention in Intermountain Gas dockets on similar grounds. ICL’s intervention will respond directly to the issues raised in the Company’s application and will not unduly broaden the scope of the issues or this proceeding.

3. ICL intends to fully participate in this matter as a party. The nature and quality of ICL’s intervention in this proceeding is dependent 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 may seek intervenor funding pursuant to IDAPA

31.01.01.161-165.

WHEREFORE, The Idaho Conservation League respectfully request the Commission grant this petition.

DATED this 15th day of December, 2022.

Respectfully submitted

/s/ Marie Callaway Kellner
Marie Callaway Kellner (ISB No. 8470)
Attorney for Idaho Conservation League

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of December, 2022, I delivered true and correct copies of the foregoing PETITION TO INTEVENE to the following persons via the method of service noted:

/s/ Marie Callaway Kellner

Marie Callaway Kellner (ISB No. 8470)
Attorney for the Idaho Conservation League
710 N. 6th St.
Boise, Idaho 83702
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Electronic Mail Only (See Order No. 35058)

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