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Attorney for the Idaho Conservation League

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

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|----------------------------------|---|-------------------------------------|
| IN THE MATTER OF DEFERRED |) | |
| ACCOUNTING OF INCREMENTAL |) | CASE NO. GNR-U-20-03 |
| COSTS ASSOCIATED WITH THE |) | |
| COVID-19 PUBLIC HEALTH |) | PETITION TO INTERVENE OF THE |
| EMERGENCY. |) | 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 direct and substantial interests in these proceedings, and therefore should be granted intervention.

1. The name of this intervenor is:

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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 investor-owned utilities serving various

communities across Idaho and to its long-term role advocating for public values. As Idaho's largest state-based conservation organization, we have approximately 11,000 members most of whom are residential customers of Idaho Power, Avista or Rocky Mountain Power. ICL's work has not traditionally engaged with water utilities, although we have members who are water utility customers. ICL, as an organization, is an Idaho Power Schedule 9 customer in our Boise office, and Idaho Power Schedule 7 customer in our Ketchum office, and a small commercial customer of Avista in our Sandpoint office. The Commission has consistently granted ICL intervention in Rocky Mountain Power dockets to protect our member's and organization interests impacted by decisions applicable to that utility. ICL understands this docket will not result in direct rate increases at this time, but this docket does implicate important public policy issues on the appropriate balance of potential impacts to utility shareholders and customers that arise from reduced demand for services. ICL's intervention will not unduly broaden the issues in this proceeding as we will stay within the boundaries and procedure announced in Order 34643.

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.

WHEREFORE, ICL respectfully requests the Commission grant this petition.

Respectfully submitted this 23rd day of April 2020.

/s/ Benjamin J. Otto
Benjamin J. Otto
Idaho Conservation League

CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of April, 2020, I delivered true and correct copies of the foregoing PETITION TO INTERVENE to the following persons via the method of service noted:

/s/ Benjamin J. Otto

Electronic mail only (See Order 34602):

Idaho Public Utilities Commission

Diane Hanian, Secretary
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