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IDAHO PUBLIC
UTILITIES COMMISSION

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

**PETITION TO INTERVENE IN THE MATTER OF THE APPLICATION OF IDAHO
POWER COMPANY FOR DEFERRAL AND RECOVERY COSTS ASSOCIATED
WITH PARTICIPATION AN ENERGY IMBALANCE MARKET**

CASE N^o. IPC-E-16-19

Pursuant to the Idaho Public Utilities Commission's Rules of Procedure Rule 71, IDAPA 31.01.01.071, et seq., and in response to Commission Order No. 33595, the Snake River Alliance petitions the Commission to grant its petition for intervention in the above-referenced case, IPC-E-16-19. The name and address of the Intervenor is:

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Pending further notice to the Commission and to Parties, Ken Miller will represent the Snake River Alliance in this proceeding. Correspondence in this docket can be sent to the above address or via email. To reduce costs and environmental impacts of exchanging information in this case, the Alliance requests that, pursuant to IPUC Rules, information other than that which might be deemed confidential or otherwise must be hand-delivered electronically and/or via email to the above address.

The Snake River Alliance is an Idaho-based non-profit organization, established in 1979 to address Idahoans' concerns about nuclear waste and safety issues. In 2007, the Alliance expanded the scope of its mission by becoming Idaho's first nonprofit clean energy advocacy

organization. The Alliance's energy program advocates for renewable energy resources in Idaho; expanded conservation and demand-side management programs offered by Idaho's regulated electric utilities and the Bonneville Power Administration; and development of local, state, regional, and national initiatives to advance sustainable energy policies, including electric utility rate structures and designs that promote energy conservation and serve the interests of residential customers of Idaho's regulated gas and electric utilities. The Alliance pursues these programs on behalf of its members, most of whom are customers of Idaho Power Company and who have a direct interest in this docket.

The Alliance has a direct and substantial interest in these proceedings as the Company's request raises policy issues of interest to the Alliance and its members and other Idaho Power customers. With regard to this docket, the Alliance intends to demonstrate support for Idaho Power's application and its position that an Energy Imbalance Market (EIM) has the potential to deliver real-time and immediate benefits to Idaho Power customers by identifying least-cost energy resources to meet immediate and real-time customer demand. EIMs are proven and effective tools to address energy imbalances while also supporting the balancing responsibilities of utilities participating in the EIM pool. EIM trading mechanisms have proven to be more economic and effective than traditional two-party energy delivery agreements between utilities. While withholding endorsement of Idaho Power's cost-recovery proposals (including the Company's anticipated incremental costs of \$15.77 million) pending the processing of this case, the Alliance acknowledges that Idaho Power should be expected to incur EIM-related costs, as described in its Application, and should be entitled to recovering those costs in future proceedings.

The Alliance believes its participation as an intervenor will not complicate or extend this case, nor will its participation unduly broaden the issues in this case, and that to the extent permitted by Commission rules it will actively participate in this case as an intervenor.

Therefore and pursuant to Rules 72 and 73 of the Commission's Rules of Procedure, IDAPA 31.01.01.072 and 073, the Alliance requests that this petition to participate as an intervenor in Case No. INT-G-16-02 be granted.

Respectfully submitted this 23rd day of September 2016.



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Hand Delivered

Jean Jewell, Commission Secretary

Idaho Public Utilities Commission
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