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IDAHO PUBLIC UTILITIES COMMISSION

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF THE PETITION OF )	CASE NO. IPC-E-17-01
IDAHO POWER COMPANY FOR )	
A DECLARATORY ORDER REGARDING )	JOINT PETITION TO INTERVENE
PROPER CONTRACT TERMS, )	OF IDAHO CONSERVATION
CONDITIONS, AND AVOIDED COST )	LEAGUE AND SIERRA CLUB
PRICING FOR BATTERY STORAGE )	
FACILITIES )	

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Pursuant to IDAPA 31.01.01.042, Idaho Conservation League (ICL) and Sierra Club hereby submit this petition to intervene as joint parties. ICL and Sierra Club share many strategic goals and interests. Specifically for this docket, as discussed in more detail below, both ICL and Sierra Club have direct and substantial interests in the development of cost-effective renewable generation resources, including those developed by qualified facilities pursuant to the federal Public Utilities Regulatory Policy Act.

**Idaho Conservation League**

1. The name and address of Idaho Conservation League is:

Idaho Conservation League  
710 N. 6th St.  
Boise, Idaho 83702  
Ph: (208) 345-6933 x12  
Fax (208) 344-0344  
botto@idahoconservation.org

2. Idaho Conservation League claims a direct and substantial interest in this proceeding arising from the impact to its members served by Idaho Power and to its long-term role advocating for public values. As Idaho's largest state-based conservation organization, ICL represents 25,000 supporters, most of whom are residential customers of Idaho Power. ICL, as an entity, is a small commercial customer of Idaho Power. ICL and our supporters have an interest in ensuring Idaho Power's electric system provides reliable, fair-priced service that protects the clean air, clean water, and stable climate that are foundational public values for Idahoans. ICL brings a unique and valuable perspective to this proceeding because our members are customers of Idaho Power who support the transition to clean energy resources including battery storage. ICL's intervention represents our supporters' interest in ensuring fair and equitable rules that allow independent clean energy providers to compete in Idaho.

**Sierra Club**

3. The name and address of Sierra Club is:

Sierra Club  
2101 Webster Street, Suite 1300  
Oakland, CA 94612  
(415) 977-5727

4. Sierra Club is a national, non-profit environmental and conservation organization incorporated under the laws of the State of California. The Sierra Club is dedicated to the protection of public health and the environment. Sierra Club petitions to intervene on behalf of itself and over 2,600 Sierra Club members who live and purchase utility services in Idaho, many of whom are residential customers of Idaho Power. Sierra Club brings a unique and valuable perspective to this proceeding because its members are customers of Idaho Power who support the transition to clean energy resources including battery storage. Sierra Club's intervention represents its members' interests in ensuring and promoting fair and equitable rules and policies that allow clean energy, including by qualified facilities, to compete and provide cost-effective energy in Idaho.

5. Sierra Club, on behalf of its members, has a right to participate in this proceeding to inform the Commission of their interests, both environmental and economic, that relate to the development of cost effective clean energy solutions in Idaho.

6. The joint intervention of ICL and Sierra Club will not unduly broaden the issues or delay the proceeding because the interests of ICL and Sierra Club are directly related to the subjects addressed in Idaho Power's petition.
7. Sierra Club and ICL request that all future pleadings, correspondence, discovery, and other documents be served on the following:

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WHEREFORE, ICL and Sierra Club respectfully request that the Commission issue an order granting ICL and Sierra Club permission to appear in this matter as joint parties.

Dated this 4<sup>th</sup> day of April, 2017.

Respectfully submitted,



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Benjamin J. Otto  
*Attorney for Idaho Conservation League and Sierra Club*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 4<sup>th</sup> day of April 2017, I delivered true and correct copies of the foregoing PETITION TO INTERVENE to the following persons via the method of service noted:

Hand delivery:

Jean Jewell  
Commission Secretary  
Idaho Public Utilities Commission  
427 W. Washington St.  
Boise, ID 83702-5983  
(Original and seven copies provided)

Electronic Mail:

**Idaho Power**  
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Four, LLC**

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