BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE )
APPLICATION OF IDAHO POWER ) CASE NO. IPC-E-18-15
COMPANY TO STUDY THE COSTS, ) PETITION TO INTERVENE
BENEFITS, AND COMPENSATION ) OF THE IDAHO SIERRA CLUB
OF NET EXCESS ENERGY )
SUPPLIED BY CUSTOMER ONSITE )
GENERATION

Pursuant to IDAPA 31.01.01.042, the Idaho Sierra Club ("Sierra Club") hereby submits
this petition to intervene in the above captioned matter. As discussed below, Sierra Club has
direct and substantial interests in these proceedings, and therefore should be granted intervention.

1. The name of this intervenor is:

Idaho Sierra Club
Zack Waterman
Mike Heckler
503 W Franklin St
Boise, Idaho 83702
Ph: (208) 384-1023
zack.waterman@sierraclub.org
michael.p.heckler@gmail.com
This Intervenor will be represented by:
Kelsey Jae Nunez, ISB No. 7899
Kelsey Jae Nunez LLC
920 N Clover Dr
Boise, Idaho 83703
Ph: (208) 391-2961
kelsey@kelseyjaenunez.com

Please provide copies of all pleadings, production requests, production responses, Commission orders, and other documents to the names and addresses above. Production requests, responses, notices, Commission orders, and other filings via electronic mail are preferred and allowed in accordance with IPUC Rules 31.01.01.063.02-03.

2. Sierra Club is a national, non-profit environmental and conservation organization incorporated under the laws of the State of California, duly qualified to do business in the State of Idaho. Sierra Club has 3,600 members who live and purchase utility services in Idaho, and many of those Sierra Club members are customers of Idaho Power Company.

3. Sierra Club’s Idaho members have a direct and substantial interest in this proceeding. Sierra Club’s work includes advocating for the implementation of programs that assist its members and utility consumers generally to access renewable energy and increase energy efficiency. The Sierra Club’s work includes intervening in dockets at public utility commissions nationwide, submitting comments in numerous state and federal agency energy-related proceedings and rule-making, attending and speaking at public hearings, speaking to students and civic and other organizations, and holding seminars and symposia - all in support of policies to reduce the impact of climate change and other air pollution by promoting clean energy alternatives and energy efficiency. Sierra Club members have worked tirelessly to promote clean energy alternatives and energy efficiency measures in Idaho.
4. Sierra Club’s participation as an intervenor in this proceeding will not unduly broaden the issues or delay the proceeding because Sierra Club’s interest is directly related to the subjects addressed in Idaho Power’s application. Sierra Club’s intervention will focus on the fair valuation of costs, benefits, and compensation of net excess energy supplied by customer onsite generation. Sierra Club’s involvement in this proceeding will not be duplicative of other parties in this proceeding because no other party adequately represents Sierra Club’s interests.

5. Sierra Club intends to fully participate in this matter as a party. The nature and quality of Sierra Club’s intervention in the proceeding is dependant upon the nature and effect of other evidence in this proceeding. If necessary Sierra Club, may introduce evidence, be heard in argument, and call, examine, and cross-examine witnesses. Sierra Club intends to seek intervenor funding pursuant to IDAPA 31.01.01.161-165.

WHEREFORE, Sierra Club respectfully requests the Commission grant this petition.

DATED this 30th day of November 2018.

Respectfully submitted,

Kelsey Jae Nunez
Attorney for Sierra Club
CERTIFICATE OF SERVICE

On this 30th day of November, 2018, 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 (Original and seven copies provided)
Idaho Public Utilities Commission
427 W. Washington St.
Boise, ID 83702-5983

Electronic Mail:
Idaho Power
Lisa D. Nordstrom
Tim Tatum
Connie Aschenbrenner
lnordstrom@idahopower.com
tatum@idahopower.com
caschenbrenner@idahopower.com
dockets@idahopower.com

Idaho Conservation League
Benjamin J. Otto
botto@idahoconservation.org

Vote Solar
David Bender
Earthjustice
dbender@earthjustice.com

Idaho PUC Staff
Sean Costello, Deputy Attorney General
sean.costello@puc.idaho.gov

Boise City Attorney's Office
Abigail R. Germaine
Deputy City Attorney
agermaine@cityofboise.org

Idahohydro
C. Tom Arkoosh
Arkoosh Law Offices
tom.arkoosh@arkoosh.com
erin.cecil@arkoosh.com

Rocky Mountain Power
Ted Weston
ted.weston@pacificorp.com

Idaho Irrigation Pumpers Association
Eric L. Olsen
Echo Hawk & Olsen PLLC
elo@echohawk.com

Yvonne R. Hogle
Rocky Mountain Power
yvonne.hogle@pacificorp.com

Idaho Clean Energy Association
Preston N. Carter
Deborah E. Nelson
Givens Pursley LLC
prestoncarter@givenspursley.com
den@givenspursley.com

Kelsey Jae Nunez
Attorney for Sierra Club

Sierra Club - Petition To Intervene - IPC-E-18-15 - 4