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Community Action Partnership
Association of Idaho

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IDAHO PUBLIC
UTILITIES COMMISSION

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION)	CASE NOS. AVU-E-12-08
OF AVISTA CORPORATION DBA AVISTA)	AVU-G-12-07
UTILITIES FOR AUTHORITY TO)	
INCREASE ITS RATES AND CHARGES FOR)	
ELECTRIC AND NATURAL GAS SERVICE)	COMMUNITY ACTION
IN IDAHO)	TION OF IDAHO'S PETITION
)	TO INTERVENE
)	

COMES NOW, Community Action Partnership Association of Idaho (hereinafter "CAPAI" or "Intervenor") and, pursuant to Rules 071-076 of the Commission's Rules of Practice and Procedure, IDAPA 31.01.01.071-076, hereby petitions the Commission for leave to intervene in this proceeding and to appear and participate with full party's rights. In support of this Petition, CAPAI states as follows:

1. The address and name of the Petitioner is:

Community Action Partnership Association of Idaho
5400 W. Franklin Rd., Suite G
Boise, ID. 83705

2. CAPAI will be represented in this proceeding by, and pleadings and other correspondence need only be sent to:

Brad M. Purdy

Attorney at Law
2019 N. 17th St.
Boise, ID. 83702
208-384-1299
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3. CAPAI is a non-profit corporation consisting of six community action agencies serving every county in Idaho and also includes, among others, the statewide Community Council of Idaho and fights the causes and conditions of poverty through building the capacity and effectiveness of its members who have a direct and substantial interest in this proceeding. These causes and conditions of poverty are numerous and disparate and include increasing utility rates such as those for AVISTA Corporation's low income rate payers.

Low income families pay a higher percentage of their income for utility expenses than those in other economic categories. CAPAI is typically the only party who intervenes in proceedings before the Commission specifically representing public utilities' low-income customers. In particular, CAPAI has been involved in a considerable number of AVISTA proceedings before this Commission widely ranging in scope in recent years. CAPAI staff works with the utility on a regular basis for many reasons such as implementation and auditing of the Company's low-income weatherization program. If granted intervention in this case, CAPAI will address a variety of issues of importance to the general body of ratepayers.

CAPAI believes that it would fulfill an important role in this proceeding if given the opportunity to participate as a party. Consequently, it is fair to say that CAPAI has a direct and substantial interest in the subject matter of this proceeding and its intervention will not unduly broaden the issues presented by AVISTA's Application.

CAPAI notes that there is currently pending a generic, electric docket (Case No. GNR-E-12-01) pertaining to the issue of low-income weatherization funding including the cost-

effectiveness of that DSM resource and the appropriate funding levels. That case is being processed under modified procedure and is still in the comment phase, the final deadline for comments being December 7, 2012. CAPAI does not know if or when there will be final, formal action taken by the Commission in Case No. GNR-E-12-01 that would fully resolve any and all issues CAPAI might wish to raise in this proceeding. Further, regardless of whether the Commission does issue some type of definitive ruling in the generic case resolving low-income issues, such a ruling will come well after the intervention deadline established by the Commission in this case and the scope and extent of such a definitive ruling is, of course, not yet known. Thus, CAPAI believes it warranted to intervene in this proceeding, certainly until future events take place.

Further, as evidenced in numerous, recent general rate cases in which CAPAI has intervened¹ CAPAI believes that its constituents' interests transcend funding for low-income weatherization funding and energy education. CAPAI intends to address the issues that affect those interests in the case at hand.

4. CAPAI respectfully requests the right to participate in this proceeding and introduce testimony and exhibits, cross-examine other witnesses, engage in oral argument, file comments, and otherwise fully participate as a party.

WHEREFORE, the Community Action Partnership Association of Idaho hereby requests that this Commission grant its Petition to Intervene in this proceeding and to fully appear and participate as a party with all the rights and responsibilities as such.

DATED, this 8th day of November, 2012.


Brad M. Purdy

¹ See, e.g., Case Nos. AVU-E-11-01, IPC-E-11-08, PAC-E-11-12, PAC-E-11-13, UWI-W-11-02.

CERTIFICATE OF SERVICE

I, the undersigned, hereby represent that on this 8th day of November, 2012, I caused a true and correct copy of this Petition to Intervene to be served on the following via U.S. Mail, First Class, Postage Prepaid.

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DATED, this 8th day of November, 2012


Brad M. Purdy