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IDAHO PUBLIC  
UTILITIES COMMISSION

Attorney for Idaho Conservation League

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER IF THE )  
COMMISSION'S INVESTIGATION )  
INTO DISSAGGREGATION AND AN )  
APPROPRIATE PUBLISHED )  
AVOIDED COSTS RATE ELIGABILITY )  
CAP STRUCUTRE FOR PURPA )  
QUALIFYING FACILITIES. )

**CASE NO. GNR-E-11-01  
PETITION TO INTERVENE**

COMES NOW The Idaho Conservation League ("ICL") with the following petition to intervene in the above captioned matter pursuant to the Idaho PUC Rules of Procedure, IDAPA 31.01.01.071-073. As discussed below, ICL has direct and substantial interests in these proceedings and will not unduly broaden the issues.

1. The name and address of this Intervenor to whom copies of all pleadings production requests, production responses, Commission orders and other documents should be provided is:

Benjamin J. Otto  
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2. Idaho Conservation League claims a direct and substantial interest in this proceeding arising from the potential impact to the more than 8,000 of our members served by Idaho's investor owned utilities. Our members are individually residential customers of all three IOU's while some also fall into other customer classes as small business owners or irrigators. As Idaho's largest and oldest state-based conservation organization, we have established a long-term interest in promoting responsible and effective renewable energy policy in Idaho. ICL brings a unique and valuable perspective to this proceeding because we represent every day Idahoans distinct from the utilities and project developers who are presently parties to the case.

3. ICL's intervention will not unduly broaden the issues in this proceeding. In fact, ICL's intervention can help to narrow or focus the issues. In this phase of this proceeding the Commission:

“solicits information and investigation of a published rate avoided cost rate eligibility structure that: (1) allows for small wind and solar QFs to avail themselves of published rates for projects producing 10 aMW or less; and (2) prevents large QFs from disaggregating in order to obtain a published avoided cost rate that exceeds a utilities avoided cost.” Order 32195 at 3.

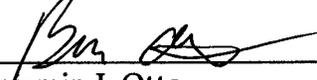
In the previous phase of this proceeding, ICL, along with the Renewable Northwest Project, submitted a discussion draft of a rule that attempted to establish this structure. By granting ICL's intervention in this phase of the proceeding, the Commission will foster continued work with all parties to refine this proposal.

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

WHEREFORE, ICL respectfully requests that the Commission grant this petition.

DATED this 3<sup>rd</sup> day of March, 2011.

Respectfully submitted,

  
\_\_\_\_\_  
Benjamin J. Otto  
Idaho Conservation League

## CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of March, 2011 true and correct copies of the foregoing PETITION TO INTERVENE were delivered to the following persons via the method of service noted:

### Hand delivery:

Jean Jewell  
Commission Secretary (Original and seven copies provided)  
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