

Betsy Bridge
Idaho Conservation League
PO Box 844
710 N 6th Street
Boise, ID 83701
Ph: (208) 345-6933 x 12
Fax: (208) 344-0344
bbridge@wildidaho.org

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IDAHO PUBLIC
UTILITIES COMMISSION

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE IDAHO POWER)
COMPANY'S APPLICATION FOR A)
CERTIFICATE OF PUBLIC CONVENIENCE) CASE NO. IPC-E-09-03
AND NECESSITY FOR THE LANGLEY)
GULCH POWER PLANT)
_____)

PETITION TO INTERVENE

Pursuant to Idaho Public Utilities Commission Rules of Procedure 53 and 71 through 73, the Idaho Conservation League ("ICL") hereby seeks intervention in the above-captioned matter. As discussed below, ICL has direct and substantial interests in these proceedings, and therefore should be granted intervention.

For thirty-four years, ICL has been Idaho's voice for clean water, clean air, and wilderness—values that are the foundation to Idaho's extraordinary quality of life. ICL works to protect these values through citizen action, public education, and professional advocacy. As Idaho's largest state-based conservation organization we represent over 9,500 members, many of whom have a deep personal interest in protecting our clean air, clean water, and quality of life. ICL's address is PO Box 844, 710 North Sixth St, Boise, Idaho 83701.

ICL has direct and substantial interests in this proceeding because investments in energy efficiency programs, acquisition of renewable resources, and impacts on the environment may be affected by the outcome of this proceeding. ICL has an interest in promoting the responsible expansion of energy efficiency and renewable energy in Idaho, and decisions issued in this case may impact its ability to advance that interest. Moreover, ICL has individual members who are customers of the Idaho Power Company. The interests advanced by ICL in this case seek to promote the acquisition of least-cost and least-risk resources.

ICL seeks intervention in order to fully participate in this matter as a party and otherwise to present such materials as may be relevant to the Commission's decision(s) in this matter. ICL intends to seek intervenor funding pursuant to RP 161 through 165.

PLEASE TAKE NOTICE that ICL requests all documents in this matter be served to the following persons:

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WHEREFORE, ICL respectfully requests that the foregoing petition to intervene be granted.

Dated: March 30, 2009

Respectfully submitted,


Betsy Bridge, Energy Efficiency Associate
On behalf of the Idaho Conservation League

CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of March, 2009, 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)
Idaho Public Utilities Commission
427 W. Washington St.
Boise, ID 83702-5983

U.S. Mail:

Barton L. Kline
Donovan E. Walker
Idaho Power Company
1221 West Idaho Street
Boise, Idaho 83707-0070


Betsy Bridge