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IDAHO PUBLIC
UTILITIES COMMISSION

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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

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

COMES NOW, Applicant the Idaho Conservation League ("ICL") and, pursuant to Idaho Code § 61-617A and Rules 161-165 of the Commission's Rules of Procedure, IDAPA 31.01.01, petitions this Commission for an award of intervenor funding.

A. Rule 161 Requirements

Idaho Power Company ("Company") is a regulated, electric public utility with gross Idaho intrastate, annual revenues exceeding three million, five hundred thousand dollars (\$3,500,000.00).

B. 162(01) Itemized list of Expenses

Consistent with Rule 162(01) of the Commission's Rules of Procedure, an itemized list of all expenses incurred by ICL in this proceeding is attached hereto as Exhibit "A."

C. 162(02) Statement of Proposed Findings

The proposed findings and recommendations of ICL are set forth in the Joint Motion to Stay by the intervenors. In review, ICL asserts authorization of the CPCN for the Langley Gulch plant should be delayed until completion of Idaho Power's 2009 Integrated Resource Plan ("IRP"). ICL has three specific concerns. First, Idaho Power's shareholders recently passed a resolution directing Idaho Power to develop a plan for reducing its emissions of greenhouse gases ("GHG"). Idaho Power agreed to prepare a GHG reduction strategy report by September 30, 2009. During the technical hearing Karl Bokenkamp testified that this strategy will be incorporated into the IRP, which could significantly alter decisions made in the IRP process. Langley Gulch, which would emit greenhouse gases, may not be the best fit to meet the Company's energy needs.

Second, Idaho Power has delayed its 2009 IRP in order to incorporate the economic downturn into its load forecast. The current economic conditions will undoubtedly have a substantial effect on the Company's energy needs. In addition, the Company has not incorporated the effect of its new DSM programs into its load forecasts. The new load forecast and the effect of new DSM should be incorporated into the 2009 IRP before Idaho Power moves forward with the Langley Gulch plant.

Third, energy policy has changed. Factors, such as, impending federal regulations involving GHG emissions, adoption of Idaho's 2007 Energy Plan, and increasing energy costs favor implementing all cost effective efficiency and DSM programs and the acquisition of renewable energy before building any more fossil fuel generation facilities.

In summary, there are many issues involving environmental regulation and future energy need that are uncertain. Several of these issues will be resolved in the next few months, which

will allow Idaho Power to properly consider these factors in the IRP process. The Commission should delay decision on Langley Gulch until the 2009 IRP is complete.

D. 162(03) Statement Showing Costs

ICL submits that the costs and fees incurred in this case, and set forth in Exhibit A, are reasonable in amount. Idaho Power's application for a CPCN for Langley Gulch was fully litigated, with a three-day technical hearing, fourteen witnesses, and numerous exhibits. ICL made a concerted effort to minimize expenses and seeks reimbursement for only attorney's fees. In addition, ICL reduced the number of attorney hours in order to account for this being counsel's first time before the Commission. ICL is not seeking recovery for 20% of attorney time because some time was spent coming up to speed on commission procedure.

E. 162(04) Explanation of Cost Statement

ICL is non-profit corporation working to protect Idaho's clean water, clean air, and wilderness. Through our energy program, we advocate for energy efficiency and renewable resources in order to mitigate the effect climate change will have on Idaho and its citizens. ICL's funding comes from a variety of sources, mostly our individual members and donations from private foundations. Its energy program is funded by one foundation and is, therefore, limited in its energy advocacy. Due to monetary limitations, ICL has only one staff member committed to energy issues. Therefore, the amount of time and resources devoted to this proceeding was a significant hardship to the organization. The availability of intervenor funding makes it more likely ICL will be able to participate in proceedings before the Commission.

F. 162(05) Statement of Difference

ICL provides a unique perspective due to its expertise in environmental regulation,

impending federal climate change legislation, and energy efficiency opportunities. First, ICL challenged Idaho Power's assertion it is pursuing all cost effective energy efficiency and DSM programs. Second, ICL addressed the need for the shareholder resolution to adopt a greenhouse gas reduction strategy to be incorporated into the 2009 IRP. Even though Staff provided valuable insight, Staff did not address the greenhouse gas resolution and had a different opinion on whether the Company is pursuing all cost effective efficiency.

G. 162(06) Statement of Recommendation

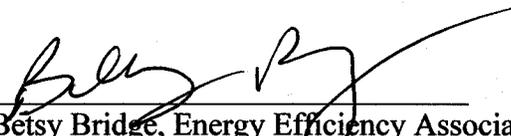
ICL's position addressed issues of concern to the general body of Idaho Power users or customers. Energy efficiency and DSM programs are the cheapest and safest way to address energy demand. Furthermore, impending federal regulation will increase the cost of any fossil fuel generation resources. The current regulatory climate makes energy efficiency and renewable energy the least risk resources options. In addition, reducing demand for energy and choosing clean energy resources benefits all Idahoans by preserving a clean environment.

H. 162(07) Statement Showing Class of Customer

ICL has individual members who are customers Idaho Power. Therefore, to the extent ICL represents a specific customer class of the Company, it is the residential class.

Dated: July 31, 2009

Respectfully submitted,


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

CERTIFICATE OF SERVICE

I hereby certify that on this 31st day of July, 2009, true and correct copies of the foregoing APPLICATION FOR INTERVENOR FUNDING were delivered to the following persons via the method of service noted:

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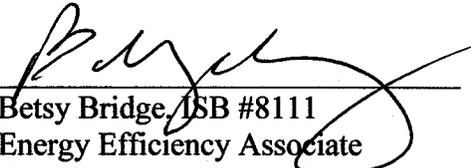

Betsy Bridge, ISB #8111
Energy Efficiency Associate
On behalf of the Idaho Conservation League

EXHIBIT "A"
ITEMIZED EXPENSES

Fees:

Legal [Betsy Bridge – 68.60 (85.75hr - 20% (17.15)hours) (\$140.00/hr)]

Total Fees **\$9,604.00**

Total Expenses **\$9,604.00**