

Betsy Bridge  
Idaho Conservation League  
PO Box 844  
710 N 6<sup>th</sup> Street  
Boise, ID 83701  
Ph: (208) 345-6933 x 12  
Fax: (208) 344-0344  
bbridge@idahoconservation.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 TO MAKE )  
THE FIXED COST ADJUSTMENT PERMANENT )      CASE NO. IPC-E-09-28  
\_\_\_\_\_ )

**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 and impacts on the environment may be affected by the

outcome of this proceeding. Under traditional rate-making practices a utility company's revenues are tied to its sales. This creates a financial disincentive for companies to promote aggressive energy efficiency. ICL has an interest in promoting the responsible expansion of energy efficiency 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.

ICL apologizes for missing the deadline to intervene and will be more prompt in the future. 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.

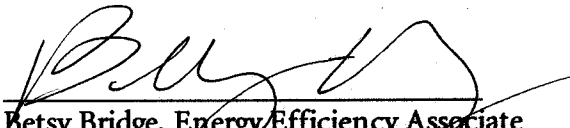
PLEASE TAKE NOTICE that ICL requests all documents in this matter be served to the following persons:

Betsy Bridge  
Idaho Conservation League  
PO Box 844  
710 North Sixth Street  
Boise, Idaho 83701  
[bbridge@idahoconservation.org](mailto:bbridge@idahoconservation.org)

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

Dated: December 17, 2009

Respectfully submitted,

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

## CERTIFICATE OF SERVICE

I hereby certify that on this 17<sup>th</sup> day of December, 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

### Electronic Mail:

Barton L. Kline  
Donovan E. Walker  
Idaho Power Company  
1221 West Idaho Street  
Boise, Idaho 83707-0070  
[BKline@idahopower.com](mailto:BKline@idahopower.com)

Scott D. Sparks  
John R. Gale  
Idaho Power Company  
P.O. Box 70  
Boise, Idaho 83707  
[ssparks@idahopower.com](mailto:ssparks@idahopower.com)  
[rgale@idahopower.com](mailto:rgale@idahopower.com)

Brad M. Purdy  
Attorney at Law .  
2019 N. 17th St.  
Boise, ID. 83702  
208-384-1299  
[bmpurdy@hotmail.com](mailto:bmpurdy@hotmail.com)

Ken Miller  
Clean Energy Program Director  
Snake River Alliance  
PO Box 1731  
Boise, ID 83701  
[kmiller@snakeriveralliance.org](mailto:kmiller@snakeriveralliance.org)

*Betsy Bridge*  
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