

Benjamin Otto (ISB No. 8292)
710 N 6th Street
PO Box 844
Boise, ID 83701
Ph: (208) 345-6933 x 12
Fax: (208) 344-0344
botto@idahoconservation.org

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IDAHO PUBLIC
UTILITIES COMMISSION

Attorney for the Idaho Conservation League, the Northwest Energy Coalition, and the Snake River Alliance

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER)
COMPANY'S REQUEST TO MODIFY) CASE NO. IPC-E-10-27
RECOVERY OF INCENTIVES PAID TO)
SECURE DEMAND-SIDE RESOURCES)

PETITION TO INTERVENE OF THE CONSERVATION PARTIES

COMES NOW the Idaho Conservation League ("ICL"), the NW Energy Coalition ("Coalition"), and the Snake River Alliance ("Alliance"), herein after the "Conservation Parties," and hereby requests leave to intervene in the above captioned matter pursuant to the Idaho Public Utilities Commission Rules of Procedure, IDAPA 31.01.01.071-073.

1. This Intervenor is an unincorporated group of three organizations that can be referred to as the "Conservation Parties." The Conservation Parties request that all pleadings, production requests, production responses, Commission orders, and other documents be submitted to their Representative:

Benjamin J. Otto
Idaho Conservation League
710 N. 6th st.
Boise, Idaho 83702
Ph: (208) 345-6933 x 12
Fax: (208) 344-0344
botto@idahoconservation.org

In addition to the Representative, copies of all pleadings, production requests, production responses, Commission orders and other documents should be provided to the parties individually, via electronic mail, at:

Nancy Hirsh
NW Energy Coalition
811 1st Ave, Suite 305
Seattle, WA 98104
Ph: (206) 621-0094
Fax: (206) 621-0097
nancy@nwenergy.org

Ken Miller
Snake River Alliance
350 N 9th St # B610
Boise, ID 83702-5473
Ph: (208) 344-9161
Fax: (208) 331-0885
kmiller@snakeriveralliance.org

2. As detailed below, the Conservation Parties claim a direct and substantial interest in this proceeding both jointly and as individual organizations. In this proceeding, Idaho Power intends to alter the manner and amount of its Demand Side Management (“DSM”) activity and investments. The Conservation Parties regularly work together to protect and promote the interests of their members and their organizations who place a primary emphasis on DSM investments throughout the region. By joining as the Conservation Parties, each group can protect its individual interests while reducing the administrative burden arising from multiple intervenors.

The Idaho Conservation League claims a direct and substantial interest in this proceeding arising from the impact to its members served by Idaho Power and to its long-term role advocating for public values statewide. As Idaho's largest state-based conservation organization, we have thousands of members who are residential customers of Idaho Power, each of whom contribute to the company's DSM programs, which is a primary subject of this proceeding. Many of our members participate in the A/C Cool Credit program, which is also a primary subject of this proceeding. In addition, ICL and its members have a broader interest in promoting DSM activity in Idaho by all customer classes because increased DSM efforts can reduce electrical costs for all

ratepayers regardless of their individual participation in programs. As contributors of funds for DSM programs, participants in DSM programs, and because of the impact DSM activity can have on electrical rates; ICL and its members have a direct and substantial interest in this proceeding. Unless granted intervener status, ICL and its members will be unable to protect their interests in the administration of Idaho Power's DSM portfolio as raised in this proceeding.

The NW Energy Coalition claims a direct and substantial interest in this proceeding arising from its long-term role in advocating for DSM investments in Idaho and across the region. The Coalition has been a member of the Idaho Power Energy Efficiency Advisory Group since 2003. The Coalition has previously been granted intervener status in cases regarding Idaho Power before the Idaho Public Utilities Commission. The Coalition is comprised of 100 environmental, civic, and human service organizations, progressive utilities, and businesses from across the region. Born out of the passage of the Pacific Northwest Electric Power Planning and Conservation Act, the Coalition has a track record of almost thirty years of effective advocacy for DSM investments and activities. DSM investments by Idaho Power can affect the regional electrical system by limiting peak demand levels, reducing transmission congestion, and contributing to market transformation – all of which are direct and substantial interests of the Coalition. Unless granted intervener status in this proceeding, the Coalition will be unable to protect its interest in ensuring adequate and effective DSM investments throughout the Pacific Northwest region.

The Snake River Alliance claims a direct and substantial interest in this proceeding arising from the impact to its members served by Idaho Power and to its long-term role advocating for public values statewide. Alliance members contribute to Idaho Power's DSM programs, participate in DSM programs, and have an interest in promoting DSM investments more broadly because this can reduce electrical costs for all ratepayers. While these interests are similar to ICL, there are individuals members unique to each group who have a direct and

substantial interest in funding and administration of Idaho Power's DSM portfolio. Unless granted intervener status, the Alliance and its members will be unable to protect their interests in the administration of Idaho Power's DSM portfolio.

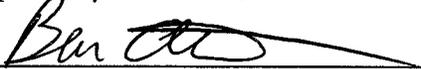
3. Because each of the Conservation Parties claim a direct and substantial interest in this proceeding, by petitioning as joint intervenors, they will not unduly broaden the issues, rather present a unified position that should help to narrow and fully illuminate the issues.

4. The Conservation Parties intend to fully participate in this matter, 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 the Conservation Parties' intervention in the proceeding is dependant upon the nature and effect of other evidence in this proceeding. The Conservation Parties intend to seek intervenor funding pursuant to IDAPA 31.01.01.161-165.

WHEREFORE, The Conservation Parties respectfully request the Commission grant the foregoing petition to intervene.

DATED this 29th day of November 2010.

Respectfully submitted,



Benjamin J. Otto

On behalf of the Idaho Conservation League,
the NW Energy Coalition, and the
Snake River Alliance

CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of November, 2010 true and correct copies of the foregoing PETITION TO INTERVENE were delivered to the following persons via the method of service noted:

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IDAHO PUBLIC
UTILITIES COMMISS

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:

Lisa D. Nordstrom
Donovan E. Walker
Idaho Power Company
1221 West Idaho Street
Boise, Idaho 83707-0070
lnordstrom@idahopower.com
dwalker@idahopower.com

Dr. Don Reading
6070 Hill Road
Boise, Idaho 83703
Telephone: (208) 342-1700
Fax: (208) 383-0401
dreading@mindspring.com

John R. Gale
Darlene Nemnich
Idaho Power Company
P.O. Box 70
Boise, Idaho 83707
rgale@idahopower.com
dnemnich@idahopower.com

Peter J. Richardson
Gregory M. Adams
Richardson & O'Leary, PLLC
515 N. 27th Street
P.O. Box 7218
Boise, ID 83702
Telephone: (208) 938-2236
Fax: (208) 938-7904
peter@richardsonandoleary.com
greg@richardsonandoleary.com


Benjamin J. Otto
Idaho Conservation League