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**SNAKE RIVER  
ALLIANCE**

**IDAHO'S NUCLEAR WATCHDOG  
& CLEAN ENERGY ADVOCATE**

[www.snakeriveralliance.org](http://www.snakeriveralliance.org)

July 1, 2011

Jean Jewell  
Commission Secretary  
Idaho Public Utilities Commission  
472 W. Washington St.  
Boise, ID 83702

Dear Ms. Jewell,

Pursuant to Commission Order 32272, please find attached four copies of the Snake River Alliance's Petition to the Public Utilities Commission to Intervene in Case No. IPC-E-11-08.

Respectfully submitted,

Ken Miller  
Clean Energy Program Director  
Snake River Alliance  
Box 1731  
Boise, ID 83701  
208 344-8161  
208 841-6982 (c)

July 1, 2011  
Ken Miller  
SNAKE RIVER ALLIANCE  
Box 1731  
Boise, ID 83701  
Ph: (208) 344-9161

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IDAHO PUBLIC  
UTILITIES COMMISSION

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF THE APPLICATION ) CASE NO. IPC-E-11-08  
OF IDAHO POWER COMPANY FOR )  
AUTHORITY TO INCREASE ITS RATES ) PETITION TO INTERVENE OF  
AND CHARGES FOR ELECTRIC )  
SERVICE IN IDAHO ) THE SNAKE RIVER ALLIANCE

COMES NOW, Snake River Alliance and pursuant to the Idaho Public Utilities Commission's Rules of Procedure Rule 71 IDAPA 31.01.01.71, petitions the Commission to grant its request for intervention in the above-referenced case, IPC-E-11-08. The name and address of this intervenor is:

Snake River Alliance  
Box 1731  
Boise, ID 83701  
208 344-9161 (o)  
208 841-6982 (c)

The Snake River Alliance is represented in this proceeding by Ken Miller. Correspondence in this docket can be sent to the above address or via e-mail to: [kmiller@snakeriveralliance.org](mailto:kmiller@snakeriveralliance.org)

The Snake River Alliance is an Idaho-based non-profit organization, established in 1979 to address Idahoans' concerns about nuclear safety issues. In early 2007, the Alliance expanded the scope of its mission by launching its Clean Energy Program. The Alliance's energy initiative includes advocacy for renewable energy resources in Idaho; expanded conservation and demand-side management programs offered by Idaho's regulated utilities and the Bonneville Power Administration; and development of local, state, regional, and national initiatives to advance sustainable energy policies. The Alliance is pursuing these programs on behalf of its members, many of whom are customers of Idaho Power and who are interested in advancing progressive energy policies. In particular, the Alliance and those we represent, primarily residential customers of Idaho Power, are interested in promoting energy efficiency and conservation through such mechanisms as electric utility rate designs; and promoting clean energy resource decisions, which in this case will deal in part with Idaho Power's proposed future participation in the operation of coal-fired generation fleets in Wyoming and Nevada. These are but two issues identified in Idaho Power's application in which the Alliance and our constituents have an interest that we believe merits consideration in this general rate case.

The Alliance has participated before and commented to the Commission in multiple regulatory proceedings on behalf of our members and as a public interest organization representing clean and affordable energy interests in Idaho. Petitioner Ken Miller has participated in prior Idaho Power general rate cases, among other dockets before the Commission.

The Alliance works closely on regulatory, policy, and economic issues dealing with energy efficiency and renewable energy development in Idaho and on issues dealing with integrating those resources into existing utility systems. The Alliance and its Idaho constituents support development of appropriately sited renewable energy projects, and have an interest in ensuring that integrating these resources is done in a way that provides environmental benefits while also maintaining reasonable customer rates, utility system reliability, and resource adequacy.

The Alliance also supported the bulk of Idaho Power's proposal to establish the current tiered rate structure that is in place today. We are also interested in exploring additional rate-design energy conservation and efficiency measures, including time-of-day pricing and other mechanisms that will be examined in this and future general rate cases. And we have been involved in supporting establishment of a permanent fixed-cost adjustment (decoupling) mechanism for Idaho Power, which is seeking to make its current pilot FCA mechanism permanent. We have also supported in principle Idaho Power's prior request to the Commission to revise the regulatory treatment of some of its demand-side management (DSM) incentive payments, including the inclusion of some of those payments in base rates. The Commission determined that request should be best handled in this general rate case, and we anticipate continuing our participation in the DSM issues in this case.

As a lead public interest entity working toward sustainable energy policies in Idaho, we anticipate participating in this case on our behalf of our constituents. We believe our participation in this case will assist the Commission and the Parties in working toward a successful outcome inasmuch as the Alliance can help bring to this case the voice of clean energy advocates and also that of Idaho Power's residential customer class. Mindful of Commission orders, the Alliance will not engage in cross-examination of witnesses in this case as we are not represented by legal counsel. However, we believe our participation in the fact-finding and negotiation aspects of this case will help represent the interests of the hundreds of conservation-minded residential utility customers we represent.

WHEREFORE, the Alliance therefore respectfully requests the Commission grant its request to participate in this proceeding as an intervenor on behalf of its Idaho constituents.

Respectfully submitted,

Ken Miller  
Clean Energy Program Director  
Snake River Alliance  
Boise, ID  
(208) 344-9161  
[kmiller@snakeriveralliance.org](mailto:kmiller@snakeriveralliance.org)