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IDAHO PUBLIC UTILITIES COMMISSION

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Attorney for the Idaho Conservation League

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF THE )  
APPLICATION OF IDAHO POWER )  
COMPANAY FOR AUTHORITY TO )  
CONVERT SCHEDULE 54-FIXED )  
COST ADJUSTMENT-FROM A PILOT )  
SCHEDULE TO AN ONGOING, )  
PERMENANT SCHEDULE )

CASE NO. IPC-E-11-19

PETITION TO INTERVENE OF THE  
IDAHO CONSERVATION LEAGUE

COMES NOW the Idaho Conservation League ("ICL") 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. As discussed below, ICL has direct and substantial interests in these proceedings, and therefore should be granted intervention.

1. The name of this intervenor is:

Benjamin J. Otto  
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Please provide copies of all pleadings, production requests, production responses, Commission orders, and other documents to the name and address above. In the interest of conserving natural resources and reducing the costs to all parties, please provide hard copies of pleadings, testimony, and briefs only. Production requests, responses, notices,

Commission orders, and other filings may be submitted via electronic mail in accordance with IPUC Rules 31.01.01.063.02-03.

2. 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. As Idaho's largest state-based conservation organization, we have over 20,000 supporters many of who are customers of Idaho Power. In addition to representing the interest of residential customers, ICL has an interest in expanding of energy efficiency and conservation in Idaho and the Fixed Cost Adjustment is a primary means to achieve this. Because this Commission has directed all utilities to pursue all cost effective efficiency and conservation measures, ICL's intervention will not unduly broaden the issues in this proceeding.

3. ICL intends to fully participate in this matter as a party including retaining an expert witness, Carl Linville of the Aspen Environmental Group. The nature and quality of ICL's intervention in the proceeding is dependant upon the nature and effect of other evidence in this proceeding. If necessary ICL may introduce evidence, be heard in argument, and call, examine, and cross-examine witnesses. ICL intends to seek intervenor funding pursuant to IDAPA 31.01.01.161-165.

WHEREFORE, ICL respectfully requests the Commission grant this petition.

DATED this 16<sup>th</sup> day of November 2011.

Respectfully submitted,



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Benjamin J. Otto

On behalf of the Idaho Conservation League

## CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of November, 2011, I delivered true and correct copies of the foregoing PETITION TO INTERVENE to the following persons via the method of service noted:

### Hand delivery:

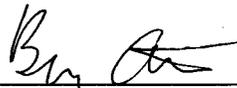
Jean Jewell  
Commission Secretary (Original and seven copies provided)  
Idaho Public Utilities Commission  
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### Electronic Mail:

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Benjamin J. Otto