

Benjamin J. Otto (ISB No. 8292)  
710 N 6<sup>th</sup> Street  
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

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

|                             |   |                              |
|-----------------------------|---|------------------------------|
| IN THE MATTER OF THE        | ) |                              |
| APPLICATION OF IDAHO POWER  | ) |                              |
| COMPANY FOR A DETERMINATION | ) | CASE NO. IPC-E-12-15         |
| OF 2011 DEMAND SIDE         | ) |                              |
| MANAGEMENT ("DSM")          | ) | PETITION TO INTERVENE OF THE |
| EXPENDITURES AS PRUDENTLY   | ) | IDAHO CONSERVATION LEAGUE    |
| INCURRED.                   | ) |                              |

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

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, comments, testimony, or 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. Although the Notice of Application indicates this proceeding will use Modified Procedure, the Commission should grant ICL's petition. The Rules of Procedure state the Commission "will grant intervention" when a petitioner "shows a direct and substantial interest in any part of the subject matter of a proceeding and does not unduly broaden the issues[.]" IDAPA 31.01.01.074. Idaho Power's Application initiates a formal proceeding. IDAPA 31.01.01.25 and 51 – 52. The rules explain that Modified Procedure is a method for processing a proceeding. IDAPA 31.01.01.201. ICL submits this petition in order to gain a right to discovery and a right to participate in any potential hearings or arguments that may occur. IDAPA 31.01.01.038 and 222. Only by gaining status as a party to this proceeding can ICL fully and fairly represent its direct and substantial interests in this proceeding described in the following paragraph.

3. Idaho Conservation League claims a direct and substantial interest in this proceeding arising from the impact to us and on behalf of our members as customers of Idaho Power. ICL has an interest as a small commercial customer of Idaho Power taking service under schedule 7. As Idaho's largest state-based conservation organization, we represent over 20,000 supporters, most of whom are residential customers of Idaho Power. On behalf of our organization and our members, ICL has a long-standing interest in expanding cost effective energy efficiency and conservation in Idaho. This proceeding reviews over \$42 million spent on DSM activities in 2011 to ensure these investments were cost effective and produced verifiable energy savings. ICL and our members have a direct and substantial interest in ensuring this ratepayer money was prudently spent and that Idaho Power continues to pursue all cost effective energy efficiency opportunities. 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.

4. ICL intends to fully participate in this matter as a party. The nature and quality of ICL's intervention in the proceeding is dependant upon the nature and effect of other parties in this proceeding. If a hearing or argument does occur ICL may introduce evidence, be heard, and call, examine, and cross-examine witnesses.

WHEREFORE, ICL respectfully requests the Commission grant this petition.

DATED this 20<sup>th</sup> day of April 2012 .

Respectfully submitted,



Benjamin J. Otto

On behalf of the Idaho Conservation League

**CERTIFICATE OF SERVICE**

I hereby certify that on this 20th day of April, 2012 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  
427 W. Washington St.  
Boise, ID 83702-5983

Electronic Mail:

Julia A. Hilton  
Lisa D. Nordstrom  
Idaho Power Company  
P.O. Box 70  
Boise, Idaho 83707  
jhilton@idahopower.com  
lnordstrom@idahopower.com

Darlene Nemnich  
Greg Said  
Idaho Power Company  
P.O. Box 70  
Boise, Idaho 83707  
dnemnich@idahopower.com  
gsaid@idahopower.com

Peter J. Richardson  
Gregory M. Adams  
Richardson & O'Leary, PLLC  
515 N. 27th Street  
Boise, ID 83702  
peter@richardsonandoleary.com  
greg@richardsonandoleary.com

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

  
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Benjamin J. Otto