# McDevitt & Miller LLP

Lawyers

420 W. Bannock Street P.O. Box 2564-83701 Boise, Idaho 83702 RECEIVED

2013 JAN 29 PCh3: 3. McDevitt
IDAHO PUBLIC JOSE Miller
UTILITIES COMMISSION

January 29, 2013

### Via Hand Delivery

(208) 343-7500

(208) 336-6912 (Fax)

Jean Jewell, Secretary Idaho Public Utilities Commission 472 W. Washington St. Boise, Idaho 83720

Re: Case No. IPC-E-12-27

Idaho Clean Energy Association Inc.

Dear Ms. Jewell:

Enclosed for filing in the above matter, please find an original and seven (7) copies of Idaho Clean Energy Association Inc's Petition to Intervene.

Kindly return a file stamped copy to me.

Very Truly Yours,

McDevitt & Miller LLP

Dean J. Miller

DJM/hh Enclosures

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IDAHO PUBLIC UTILITIES COMMISSION

Dean J. Miller (ISB No. 1968) Chas. F. McDevitt (ISB No. 835) Celeste K. Miller (ISB No. 2590) McDEVITT & MILLER LLP 420 West Bannock Street P.O. Box 2564-83701 Boise, ID 83702 Tel: 208.343.7500

Fax: 208.336.6912 joe@mcdevitt-miller

joe@mcdevitt-miller.com chas@mcdevitt-miller.com ck@mcdevitt-miller.com

Attorney for Idaho Clean Energy Association Inc.

#### BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION
OF IDAHO POWER COMPANY FOR
AUTHORITY TO MODIFY ITS NET
METERING SERVICE AND TO INCREASE
THE GENERATION CAPACITY LIMIT

Case No. IPC-E-12-27

PETITION TO INTERVENE OF IDAHO CLEAN ENERGY ASSOCIATION INC.

COMES NOW the Idaho Clean Energy Association Inc., (ICEA) and, pursuant to RP 72-75, Petitions to Intervene in the above matter, and in support thereof respectfully shows as follows, to wit:

I.

ICEA is a corporation organized and existing under the laws of the State of Idaho pursuant to the Idaho Nonprofit Corporation Act, Idaho Code§ 30-3-1 et. seq.

II.

Among the corporate powers of ICEA is "to advocate for the advancement of clean energy in public policy and public discourse".

III.

The membership of ICEA is comprised of business enterprises dedicated to the advancement of the clean energy industry in Idaho.

IV.

The Board of Directors of ICEA has authorized the filing of this Petition and participation in this proceeding.

V.

All pleadings, papers, orders and notices should be served upon:

Dean J. Miller
McDEVITT & MILLER LLP
P.O. BOX 2564-83701
Boise, Idaho 83702
joe@mcdevitt-miller.com

And

Board of Directors Idaho Clean Energy Association Inc. P.O. Box 1212 Boise, ID 83701

VI.

ICEA desires to participate in this proceeding with full rights of a party to, if necessary, introduce evidence, cross examine and participate in hearings or oral argument. The exact quantity of evidence to be introduced cannot be stated at this time, but ICEA's participation will not unduly broaden the issues or cause delays.

VII.

ICEA claims a direct and substantial interest in the proceeding because the proposals contained in Idaho Power's Application, if approved, would hamper the growth of the green energy industry in Idaho.

PETITION TO INTERVENE OF IDAHO CLEAN ENERGY ASSOCIATION INC.-2

#### VIII.

ICEA believes that the nature and complexity of issues presented by Idaho Power Company's Application are such that they would be best examined by a technical hearing. ICEA requests that the Commission schedule a technical hearing, preceded by an appropriate period during which discovery may be conducted.

IX.

Depending on future developments, ICEA may seek intervenor funding pursuant to RP 161-165.

DATED this \_\_\_\_ day of January, 2013.

IDAHO CLEAN ENERGY ASSOCIATION INC.

Dean J. Miller

Attorney for Idaho Clean Energy Association Inc.

## **CERTIFICATE OF SERVICE**

I hereby certify that on the Aday of January, 2013, I caused to be served, via the method(s) indicated below, true and correct copies of the foregoing document, upon:

Jean Jewell, Secretary Idaho Public Utilities Commission 472 West Washington Street P.O. Box 83720 Boise, ID 83720-0074 jjewell@puc.state.id.us	Hand Delivered U.S. Mail Fax Fed. Express Email	ני ני ני	
Lisa D. Nordstrom Matt Larkin Greg Said Idaho Power Company 1221 West Idaho Street (83702) P.O. Box 70 Boise, Idaho 83707 Inordstrom@idahopower.com dockets@idahopower.com mlarkin@idahopower.com gsaid@idahopower.com	Hand Delivered U.S. Mail Fax Fed. Express Email	אַני ני ני	
Benjamin J. Otto 710 N. 6 <sup>th</sup> Street Boise, Idaho 83701 botto@idahoconsevation.org	Hand Delivered U.S. Mail Fax Fed. Express Email	א ני ני ני	
Peter J. Richardson Richardson & O'Leary, PLLC PO Box 7218 Boise, ID 83702 peter@richardsonandoleary.com	Hand Delivered U.S. Mail Fax Fed. Express Email	الله الله الله الله الله الله الله الله	
Chris Aepelbacher, Project Engineer 5420 W. Wincher Road Glenns Ferry Idaho 83623 ca@powerworks.com	Hand Delivered U.S. Mail Fax Fed. Express Email	ר ני ני ני	1
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Y: Heather le. Houle
MCDEVITT & MILLER LLP