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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 THE IDAHO)
POWER COMPANY FOR AUTHORITY)
TO TEMPORARILY SUSPEND IT'S A/C)
COOL CREDIT AND IRRIGATION)
PEAK REWARDS DEMAND)
RESPONSE PROGRAMS)

CASE NO. IPC-E-12-29

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.

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 approximately 20,000 supporters, most of who are residential customers of Idaho Power. Our supporters look to ICL to represent their substantial interest in expanding cost-effective energy efficiency and conservation in Idaho. More specifically in this case, maintaining a long-term, robust demand response program will avoid burning fossil fuels and additional energy infrastructure both of which meet our supporters desire to protect Idaho's air quality and natural landscapes. As the only potential intervenor in this proceeding advocating for investments, rate designs, and rate spreads specifically intended to fully incentivize energy efficiency and demand response, ICL brings a unique and valuable perspective to this proceeding. Because this Commission has directed Idaho utilities to pursue all cost effective demand side management 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. 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. Depending on the time and resource expended in this case ICL may seek intervenor funding pursuant to IDAPA 31.01.01.161-165.

WHEREFORE, ICL respectfully requests the Commission grant this petition.

DATED this ___ day of _____ .

Respectfully submitted,



Benjamin J. Otto

On behalf of the Idaho Conservation League

CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of January, 2013, 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.
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Electronic Mail:

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