

March 3, 2013
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 OF IDAHO POWER)
COMPANY FOR AUTHORITY TO)
TEMPORARILY SUSPEND ITS)
A/C COOL CREDIT AND IRRIGATION)
PEAK REWARDS DEMAND)
RESPONSE PROGRAMS)

) CASE NO. IPC-E-12-29
)
) PETITION TO INTERVENE OF
)
) THE SNAKE RIVER ALLIANCE
)
)

COMES NOW, Snake River Alliance and, pursuant to the Idaho Public Utilities Commission's Rules of Procedure Rule 72 and 73 IDAPA 31.01.01.072 and -.073, petitions the Commission to grant its request for intervention in the above-referenced case, IPC-E-12-29. 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

The Snake River Alliance is an Idaho-based non-profit organization, established in 1979 to address Idahoans' concerns about nuclear waste and 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 electric utilities and the Bonneville Power Administration; and development of local, state, regional, and national initiatives to advance sustainable energy policies. The Alliance pursues these programs on behalf of its members, many of whom are customers of Idaho Power and who participate in one or both of the two demand response incentive programs at issue in this docket.

The Alliance has participated before and commented to the Commission in multiple electric regulatory proceedings on behalf of our members and as a public interest organization representing clean and affordable energy interests in Idaho. The Alliance has also supported maintaining and expanding Idaho Power's A/C Cool Credit and Irrigation Peak Rewards demand

response programs in earlier dockets before this Commission. We are one of the few public interest groups appearing regularly before this Commission that has advocated for robust implementation of these demand response programs as well as other demand side management programs implemented by Idaho Power.

The Alliance and its Idaho constituents have an ongoing interest in the preservation of these two demand response measures, or at a minimum the preservation of the infrastructure needed to support these programs in the event they are interrupted for one or more years and then placed back into service. We believe we bring to this case the perspective of residential and irrigation Idaho Power customers and program participants whose concerns might not otherwise be heard.

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 other intervening 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. We further believe our participation in this case is fortified and informed by our long-running participation in Idaho Power's Integrated Resource Plan Advisory Council and its Energy Efficiency Advisory Committee proceedings over the past several years. Thanks to our participation in these and other settings, we are very familiar with the changes in Idaho Power's load growth forecasts that have precipitated this Idaho Power application.

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