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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)	
COMPANY FOR A DETERMINATION)	CASE NO. IPC-E-13-08
OF 2012 DEMAND-SIDE)	
MANAGEMENT EXPENDITURES AS)	PETITION TO INTERVENE OF THE
PRUDENTLY INCURRED)	IDAHO CONSERVATION LEAGUE

COMES NOW the Idaho Conservation League (“ICL”) requesting leave to intervene in the above captioned matter pursuant to the Idaho Public Utilities Commission Rules of Procedure, IDAPA 31.01.01.071-073. 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
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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, testimony, and briefs only. Production requests, responses, notices, Commission orders, and other filings may be submitted via electronic mail in accordance with IDAPA 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. 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 its members served by Idaho Power and to its long-standing interest in expanding cost effective energy efficiency and conservation in Idaho. ICL also 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 25,000 supporters, most of whom are residential customers of Idaho Power. This proceeding reviews over \$49.3 million spent on DSM activities in 2012 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. The nature and quality of ICL’s intervention in the proceeding is dependent 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. Depending on the time and resources involved 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.

Respectfully submitted this 26th day of June 2013,



Benjamin J. Otto
Idaho Conservation League

CERTIFICATE OF SERVICE

I hereby certify that on this 26 th day of June 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.
Boise, ID 83702-5983

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