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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 IDAHO POWER)	
COMPANY'S APPLICATION FOR A)	
CERTIFICATE OF PUBLIC)	CASE NO. IPC-E-13-16
CONVIENCE AND NECESSITY FOR)	
THE INVESTMENT IN SELECTIVE)	PETITION TO INTERVENE OF THE
CATALYTIC REDUCTION CONTROLS)	IDAHO CONSERVATION LEAGUE
ON JIM BRIDGER UNITS 3 AND 4.)	

COMES NOW the Idaho Conservation League ("ICL") requesting 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
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Boise, Idaho 83702
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Please provide copies of all pleadings, production requests, production responses, Commission orders, and other documents to the 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 over 25,000 supporters, most of whom are residential customers of Idaho Power. In addition, ICL, as an organization, is a small commercial customer of Idaho Power. ICL has a long history of representing the interests of our supporters on issues affecting Idaho's air, lands, and water, including impacts caused by Idaho Power's electrical system. This proceeding will directly affect the portfolio of generation Idaho Power relies upon and, due to the Company's request for binding ratemaking treatment, Idahoans' electricity rates. Based on ICL's expertise in both the Clean Air Act and utility regulation ICL brings a unique and valuable perspective to this proceeding. ICL's intervention will not unduly broaden the issues in this proceeding; rather focus directly on comparing the costs and benefits of Idaho Power's various options to meet clean air standards.

3. The nature and quality of ICL's intervention in the proceeding is dependant upon the nature and effect of other evidence in this proceeding. ICL intends to introduce evidence, be heard in argument, and call, examine, and cross-examine witnesses. ICL intends to seek intervenor funding pursuant to IDAPA 31.01.01.161-165.

WHEREFORE, ICL respectfully requests the Commission grant this petition.

DATED this 16th day of July 2013.

Respectfully submitted,



Benjamin J. Otto
Idaho Conservation League

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of July, 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

Electronic Mail:

Lisa D. Nordstrom
Jennifer Reinhardt-Tessmer
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Benjamin J. Otto