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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 )	CASE NO. IPC-E-14-02
APPROVAL OF ITS AGREEMENT )	
WITH ENERNOC, INC., TO )	THE IDAHO CONSERVATION
IMPLEMENT AND OPERATE A )	LEAGUE
VOLUNTARY COMMERCIAL )	PETITION TO INTERVENE
DEMAND RESPONSE PROGRAM )	

The Idaho Conservation League ("ICL") petitions the Commission to intervene in this 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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In the interest of conserving natural resources and reducing the costs, please provide hard copies of pleadings, testimony, and briefs only to the name and address above. 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. The Idaho Conservation League claims a direct and substantial interest in this proceeding. As Idaho's largest state-based conservation organization, we have over 20,000 supporters, most of who are residential customers of Idaho Power. We have a substantial interest in maintaining a robust demand response program to avoid burning fossil fuels and the need for additional energy infrastructure both of which meet our supporters' desire to protect Idaho's air quality and natural landscapes. ICL participated in two prior cases that addressed the demand response programs, IPC-E-12-19 and IPC-E-13-14, including extensive work on the workshops and settlement agreement approved in IPC-E-13-14. ICL has an interest in ensuring Idaho Power's present application aligns with the terms of the Commission approved settlement in IPC-E-13-14. Due to this long-term involvement in restructuring Idaho Power's demand response programs, ICL brings a unique and valuable perspective to this proceeding. 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. ICL may seek intervenor funding pursuant to IDAPA 31.01.01.161-165.

WHEREFORE, ICL respectfully requests the Commission grant this petition.

DATED this 2<sup>nd</sup> day of April 2014.

Respectfully submitted,



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Benjamin J. Otto  
Idaho Conservation League

## CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of April, 2014, 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:

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Benjamin J. Otto