

Benjamin J. Otto (ISB No. 8292)  
710 N 6<sup>th</sup> Street  
Boise, ID 83701  
Ph: (208) 345-6933 x 12  
Fax: (208) 344-0344  
botto@idahoconservation.org

RECEIVED  
2014 JUL 15 AM 11:33  
IDAHO PUBLIC  
UTILITIES COMMISSION

Attorney for the Idaho Conservation League

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE	)	CASE NO. IPC-E-14-17
COMMISSION'S INQUIRY INTO	)	
IDAHO POWER COMPANY'S FIXED	)	PETITION TO INTERVENE
COST ADJUSTMENT MECHANISM	)	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, and therefore the Commission should grant intervention.

1. The name of this intervenor is:

Idaho Conservation League  
c/o Benjamin J. Otto  
710 N. 6<sup>th</sup> st.  
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 IPUC Rules 31.01.01.063.02-03.

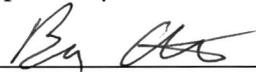
2. The Idaho Conservation League claims a direct and substantial interest in this proceeding. As Idaho's largest state-based conservation organization, we have over 20,000 supporters, most of who are residential customers of Idaho Power. ICL also has an interest as a small commercial customer of Idaho Power taking service under schedule 7. ICL and our supporters have a substantial interest in maintaining a robust energy conservation program to avoid burning fossil fuels and building additional energy infrastructure both of which meet our supporters' desire to protect Idaho's air quality and natural landscapes. To address this interest, ICL has long advocated for a robust Fixed Cost Adjustment as a necessary regulatory mechanism to support utility sponsored energy efficiency programs. ICL 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. 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 15<sup>th</sup> day of July 2014.

Respectfully submitted,



---

Benjamin J. Otto  
Idaho Conservation League

## CERTIFICATE OF SERVICE

I hereby certify that on this 15 th day of July, 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:

*Idaho Power Company*  
Idaho Power Company  
1221 West Idaho Street  
Boise, Idaho 83707 -0070  
dockets@idahopower.com

*Industrial Customers of Idaho Power*  
Peter J. Richardson  
Richardson Adams, PLLC  
515 N. 27<sup>th</sup> St  
Boise, ID 83702  
peter@richardsonadams.com

Dr. Don Reading  
6070 Hill Rd.  
Boise, ID 83703  
dreading@mindspring.com

  
\_\_\_\_\_  
Benjamin J. Otto