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IDAHO PUBLIC UTILITIES COMMISSION
Chas. F. McDevitt
Dean J. (Joe) Miller
Celeste K. Miller

August 6, 2014

Via Hand Delivery

Jean Jewell, Secretary
Idaho Public Utilities Commission
472 W. Washington St.
Boise, Idaho 83720

Re: Sierra Club/ IPC-E-14-18

Dear Ms. Jewell:

Enclosed for filing in the above matter, please find an original and seven copies of a Petition to Intervene of the Sierra Club.

Kindly return a file stamped copy to me.

Very Truly Yours,
McDevitt & Miller LLP



Dean J. Miller

DJM/hh
Enclosures

ORIGINAL

Dean J. Miller (ISB No. 1968)
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IDAHO PUBLIC
UTILITIES COMMISSION

Matt Vespa
CA Bar #222265 (*Pro Hac Vice pending*)
Sierra Club
85 Second St., 2nd Fl.
San Francisco, CA 94105
matt.vespa@sierraclub.org
Tel: 415.977.5753
Fax: 415.977.5793

Attorneys for Sierra Club

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER)	CASE NO. IPC-E-14-18
COMPANY'S APPLICATION TO)	
IMPLEMENT SOLAR INTEGRATION)	PETITION TO INTERVENE OF
RATES AND CHARGES.)	SIERRA CLUB
)	
)	

Sierra Club hereby petitions the Commission for leave to intervene in the above-titled proceeding pursuant to the Commission's Rules of Practice and Procedure, IDAPA 31.01.01.071-.75. As discussed below, Sierra Club has a direct and substantial interest in these proceedings, and therefore the Commission should grant intervention.

1. Sierra Club is a national, non-profit environmental and conservation organization incorporated under the laws of the State of California. The Sierra Club is dedicated to the protection of public health and the environment. Sierra Club petitions to intervene in this proceeding on behalf of itself and the more than 2,800 Sierra Club members who live and

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purchase utility services in Idaho, many of whom are residential customers of Idaho Power. The name and address of Petitioner Sierra Club is:

Sierra Club
85 Second Street, 2nd Floor
San Francisco, CA 94105

2. Sierra Club's Idaho members have a direct and substantial interest in this proceeding because strategic issues related to Idaho Power's July 1, 2014 Application with the Commission seeking to implement solar integration rates and charges will have environmental, health and economic consequences for Sierra Club members who are customers of Idaho Power. These Sierra Club members have a right to participate in this proceeding to inform the Commission of their interests, both environmental and economic, that relate to the impacts of implementing solar integration rates and charges.

3. Sierra Club's Beyond Coal campaign seeks rapid replacement of fossil-fueled generating units with cleaner forms of energy to eliminate or reduce global climate change emissions, reduce utility bills, and generate renewable energy. Sierra Club's work includes advocating for the implementation of robust incentive programs that assist its members and utility consumers generally to generate their own renewable energy and increase energy efficiency. The Sierra Club's work includes intervening in dockets at public utility commissions nationwide, submitting comments in numerous state and federal agency energy-related proceedings and rulemakings, attending and speaking at public hearings, speaking to students and civic and other organizations, and holding seminars and symposia - all in support of policies to reduce the impact of climate change and other air pollution by promoting clean energy alternatives and energy efficiency. Sierra Club members have worked tirelessly to promote clean energy alternatives and energy efficiency measures.

4. Sierra Club has a specific interest in this docket because its members who live within Idaho Power's service territory are ratepayers and have a pecuniary and tangible interest in the outcome of the proceeding. Sierra Club members have a direct interest in ensuring fair, accurate rates and charges for clean energy sources in order to foster clean energy development in Idaho Power's service territory. Sierra Club is concerned that the proposed charge may be excessive, fail to account for the grid benefits of solar, and improperly stifle deployment of solar in Idaho and displacement of carbon-intensive generation.

5. Intervention by Sierra Club will not unduly broaden the issues or delay the proceeding because Sierra Club's interest is directly related to the subjects addressed in Idaho Power's application.

6. Sierra Club's involvement in this proceeding will not be duplicative of other parties in this proceeding because no other party adequately represents Sierra Club's interests. While other environmental groups have petitioned to intervene in this proceeding, those groups have different expertise than Sierra Club. Sierra Club is therefore uniquely suited to representing the interests of itself and its members in this proceeding. Sierra Club will also endeavor to coordinate with other environmental groups to avoid any potentially duplicative efforts.

7. At this time, Sierra Club does not know the nature and quantity of evidence it will be presenting. Sierra Club will work with the other parties to ensure that the proceeding is conducted in an efficient manner, and Sierra Club will abide by all time limits to be established or determined in this matter.

8. Sierra Club's petition to intervene is timely and consistent with the Commission's Notice of Application, dated July 23, 2014.

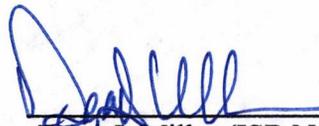
9. Sierra Club requests that all pleadings, correspondence, discovery, and other documents be served on the following:

Matt Vespa
CA Bar #222265 (*Pro Hac Vice pending*)
Sierra Club
85 Second St., 2nd Fl.
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matt.vespa@sierraclub.org
Tel: 415.977.5753
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Tel: 208.343.7500
Fax: 208.336.6912

WHEREFORE, Sierra Club respectfully requests that the Commission issue an order granting its Petition to Intervene in the above-titled proceeding.

Dated this 6th day of August, 2014



Dean J. Miller (ISB No. 1968)
McDEVITT & MILLER LLP

Matt Vespa (CA Bar #222265)
(*Pro Hac Vice pending*)
SIERRA CLUB

Attorneys for Sierra Club

CERTIFICATE OF SERVICE

I hereby certify that on the 6th day of August, 2014, I caused to be served, via the method(s) indicated below, true and correct copies of the foregoing document, upon:

Jean Jewell, Secretary
Idaho Public Utilities Commission
472 West Washington Street
P.O. Box 83720
Boise, ID 83720-0074
jjewell@puc.state.id.us

Hand Delivered
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BY: Heather Houle
MCDEVITT & MILLER LLP