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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 CONFIRMING USE OF)
THE CAPACITY DEFICIENCY)
PERIOD FOR THE INCREMENTAL)
COST, INTEGRATED RESOURCE)
PLAN, AVOIDED COST)
METHODOLOGY.)

CASE NO. IPC-E-14-22

PETITION TO INTERVENE OF THE
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. 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. 6th st.
Boise, Idaho 83702
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Fax: (208) 344-0344
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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 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 approximately 20,000 supporters many of who are customers of Idaho Power. ICL's 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. This proceeding covers a foundational aspect of ensuring accurate avoided costs and without intervening ICL will be unable to protect our members interests in this area. ICL's intervention will not unduly broaden the issues in this proceeding.

3. ICL's intend to fully participate in this matter as a party, including submitting discovery requests. The nature and quality of our intervention in the proceeding is dependent upon the nature and effect of other evidence in this proceeding. If necessary we may introduce expert testimony, be heard in argument, and call, examine, and cross-examine witnesses. 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 15^h day of September 2014,



Benjamin J. Otto
Idaho Conservation League

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of September, 2014, I delivered true and correct copies of the foregoing PETITION TO INTERVENE to the following persons via the method of service note

Hand delivery:

Jean Jewell - Commission Secretary
(Original and seven copies provided)
Idaho Public Utilities Commission
427 W. Washington St.
Boise, ID 83702-5983



Benjamin Otto

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