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IDAHO PUBLIC
UTILITIES COMMISSION

Attorney for the Idaho Conservation League

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE)	
APPLICATION OF IDAHO POWER)	CASE NO. IPC-E-16-19
COMPANY'S APPLICATION FOR)	
DEFERRAL AND RECOVERY OF)	THE IDAHO CONSERVATION
COSTS ASSOCIATED WITH)	LEAGUE
PARTICIPATION IN THE ENERGY)	PETITION TO INTERVENE
IMBALANCE MARKET.)	

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:

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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 25,000 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 ensuring prudent utility investments and in the efficient

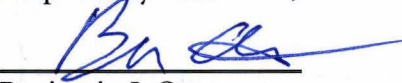
and robust integration of renewable resources to meet our supporters' desire to protect Idaho's air quality and natural landscapes. Idaho Power's potential participation in the western Energy Imbalance Market has the potential to achieve both of these goals. ICL will focus on the costs and benefits of Idaho Power's request to join the EIM and thus our 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 3rd day of October 2016.

Respectfully submitted,


Benjamin J. Otto
Idaho Conservation League

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of April 2016, 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
Idaho Public Utilities Commission
427 W. Washington St.
Boise, ID 83702-5983
(Original and seven copies provided)

Electronic Mail:

Idaho Power
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