

RECEIVED

2010 APR 26 PM 2:43

IDAHO PUBLIC  
UTILITIES COMMISSION

Benjamin J. Otto  
ISB No. 8292  
710 N 6<sup>th</sup> Street  
PO Box 844  
Boise, ID 83701  
Ph: (208) 345-6933 x 12  
Fax: (208) 344-0344  
botto@idahoconservation.org

Attorney for Idaho Conservation League

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF THE )  
APPLICATION OF ROCKY )  
MOUNTAIN POWER FOR AN )  
INCREASE TO THE CUSTOMER )  
EFFICIENCY SERVICES RATE )

CASE NO. PAC -E-10-03

**PETITION TO INTERVENE**

COMES NOW 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 should be granted intervention.

1. Please send copies of all pleadings, production requests, production responses, Commission orders, and other documents to the Intervenor at:

Benjamin J. Otto  
Idaho Conservation League  
710 N. 6<sup>th</sup> st.  
P.O. Box 844  
Boise, Idaho 83702  
Ph: (208) 345-6933 x 12  
Fax: (208) 344-0344  
botto@idahoconservation.org

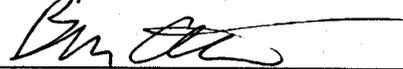
2. Idaho Conservation League claims a direct and substantial interest in this proceeding arising from the impact to its members served by Rocky Mountain Power and to its long-term role advocating for public values. ICL is Idaho's largest state-based conservation organization with 9,500 members including many residential customers of Rock Mountain Power. As the only potential intervenor in this proceeding focused only on residential customers and advocating for investments in energy efficiency and conservation, ICL brings a unique and valuable perspective to this proceeding. Because this Commission has directed all utilities to pursue all cost effective efficiency and conservation measures, ICL's intervention will not unduly broaden the issues in this proceeding.

3. ICL intends to fully participate in this matter as a party, and if necessary, may introduce evidence, be heard in argument and call, examine and cross-examine witnesses as may be relevant in this matter. 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 intends to seek intervenor funding pursuant to IDAPA 31.01.01.161-165.

WHEREFORE, ICL respectfully requests the Commission grant this petition.

DATED this 26<sup>th</sup> day of 2010.

Respectfully submitted,



Benjamin J. Otto

On behalf of the Idaho Conservation League

**CERTIFICATE OF SERVICE**

I hereby certify that on this 26th day of April, 2010, true and correct copies of the foregoing PETITION TO INTERVENE were delivered 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

U.S. Mail:

Daniel Solander  
Senior Counsel  
201 South Main, Suite 2300  
Salt Lake City, UT 84111  
Telephone: (801) 220-4014  
Facsimile: (801) 220-3299  
E-mail: Daniel.Solander@PacifiCorp.com

Ted Weston  
Idaho Regulatory Affairs Manager  
201 South Main, Suite 2300  
Salt Lake City, UT 84111  
Telephone: (801) 220-2963  
Facsimile: (801) 220-2798  
E-mail: Brian.Dickman@PacifiCorp.com

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

