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IDAHO PUBLIC
UTILITIES COMMISSION

Attorney for Idaho Conservation League

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF PACIFICORP DBA ROCKY MOUNTAIN POWER FOR APPROVAL OF CHANGES TO ITS ELECTRIC RATE SCHEDULES)))))	CASE NO. PAC-E-11-12 PETITION TO INTERVENE
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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 should be granted intervention.

1. The name of this intervenor is:

Benjamin J. Otto
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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.

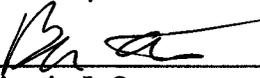
2. The Idaho Conservation League's direct and substantial interest in this proceeding arises from the impact to our members served by Rocky Mountain Power and our long-term role advocating for public values. As Idaho's largest state-based conservation organization, we have many members who are residential customers of Rocky Mountain Power. In addition to representing the interest of residential customers, ICL has an interest in promoting the responsible expansion of energy efficiency and renewable energy in Idaho. As the only potential intervenor in this proceeding focused primarily on advocating for investments, policies, and rate designs specifically intended to fully incentivize energy efficiency and conservation, ICL brings a unique and valuable perspective to this proceeding. Because this Commission has directed Idaho utilities to pursue all cost effective energy 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 the foregoing petition.

DATED this 20th day of June 2011.

Respectfully submitted,



Benjamin J. Otto
Idaho Conservation League

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of June 2011, I delivered true and correct copies of the foregoing PETITION TO INTERVENE to the following via the method of service noted:

Hand delivery:

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

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