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IDAHO PUBLIC
UTILITIES COMMISSION

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

Attorney for the Idaho Conservation League

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE)
APPLICATION OF ROCKY)
MOUNTAIN POWER FOR)
AUTHORITY TO DECREASE THE)
CUSTOMER EFFICIENCY SERVICES)
RATE)

CASE NO. PAC-E-12-11

PETITION TO INTERVENE OF THE
IDAHO CONSERVATION LEAGUE

COMES NOW the 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. The name of this intervenor is:

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

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. Although the Notice of Application indicates this proceeding will use Modified Procedure, the Commission should grant ICL's petition. The Rules of Procedure state the Commission "will grant intervention" when a petitioner "shows a direct and substantial interest in any part of the subject matter of a proceeding and does not unduly broaden the issues[.]" IDAPA 31.01.01.074. Rocky Mountain Power's Application initiates a formal proceeding. IDAPA 31.01.01.25 and 51 – 52. ICL submits this petition in order to gain a right to discovery and a right to participate in any potential settlement negotiations, hearings, or arguments that may occur. IDAPA 31.01.01.038 and 222. Only by gaining status as a party to this proceeding can ICL fully and fairly represent its direct and substantial interests in this proceeding described in the following paragraph.

3. The 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. As Idaho's largest state-based conservation organization, we have approximately many supporters who are residential customers of Rocky Mountain Power. In addition to representing the interest of residential customers, ICL has an interest in expanding energy efficiency and conservation in Idaho. Rocky Mountain Power's proposal to reduce energy efficiency funding directly effects this interest. As the only potential intervenor in this proceeding advocating for investments specifically intended to fully incentivize energy efficiency and conservation, ICL brings a unique and valuable perspective to this proceeding. Because this Commission

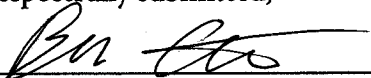
has directed all utilities to pursue all cost effective efficiency and conservation measures, ICL's intervention will not unduly broaden the issues in this proceeding.

4. 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. If necessary ICL may introduce evidence, 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.

DATED this 1st day of June 2012.

Respectfully submitted,



Benjamin J. Otto
Idaho Conservation League

CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of June, 2012, 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 (Original and seven copies provided)
Idaho Public Utilities Commission
427 W. Washington St.
Boise, ID 83702-5983

Electronic Mail:

Ted Weston, Manager of Idaho Regulatory Affairs
Daniel E. Solander, Senior Counsel
PacifiCorp/dba Rocky Mountain Power
201 S. Main St., Suite 2300
Salt Lake City, UT 84111
Ted.weston@pacificorp.com
Daniel.Solander@pacificorp.com



Benjamin J. Otto