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3. CAPAI is a non-profit corporation consisting of six community action agencies serving every county in Idaho and also includes, among others, the statewide Community Council of Idaho and fights the causes and conditions of poverty through building the capacity and effectiveness of its members who have a direct and substantial interest in this proceeding. These causes and conditions of poverty are numerous and disparate and include increasing utility rates such as those for Rocky Mountain's low income rate payers.

Low income families pay a higher percentage of their income for utility expenses than those in other economic categories. CAPAI is typically the only party who intervenes in proceedings before the Commission specifically representing public utilities' low-income customers. CAPAI has been involved in a considerable number of PacifiCorp proceedings before this Commission widely ranging in scope in recent years. CAPAI staff works with the utility on a regular basis for many reasons such as implementation and auditing of the Company's low-income weatherization program and has advocated its position on issues in general rate proceedings affecting the residential class as a whole and including, among other things, issues involving revenue requirement and rate design as well as low-income assistance. If granted intervention in this case, CAPAI will continue to address a variety of issues of importance to the general body of ratepayers.

CAPAI believes that it would fulfill an important role in this proceeding if given the opportunity to participate as a party. Consequently, it is fair to say that CAPAI has a direct and substantial interest in the subject matter of this proceeding and its intervention will not unduly broaden the issues presented by Rocky Mountain's Application.

4. CAPAI respectfully requests the right to participate in this proceeding and introduce testimony and exhibits, cross-examine other witnesses, engage in oral argument, file comments, and otherwise fully participate as a party.

WHEREFORE, the Community Action Partnership Association of Idaho hereby requests that this Commission grant its Petition to Intervene in this proceeding and to fully appear and participate as a party with all the rights and responsibilities as such.

DATED, this 21st day of March, 2013.

  
Brad M. Purdy