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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 TO)
INITIATE DISCUSSIONS WITH)
INTERESTED PARTIES ON)
ALTERNATIVE RATE PLAN)
PROPOSALS)

CASE NO. PAC-E-13-04
PETITION TO INTERVENE

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 the Commission should grant this petition.

1. The name of this intervenor is:

Benjamin J. Otto
Idaho Conservation League
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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 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. As Idaho's largest state-based conservation organization, the Idaho Conservation League submits this petition to protect the interest of our members served by Rocky Mountain Power and our long-term role advocating for public values. 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. The “Alternative Rate Plan” mentioned in RP’s application might implicate all of these issues. Only by gaining status as a party to this proceeding can ICL fully and fairly represent its direct and substantial interests 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 may seek intervenor funding pursuant to IDAPA 31.01.01.161-165.

WHEREFORE, ICL respectfully requests the Commission grant the foregoing petition.

DATED this 22nd day of March 2013.

Respectfully submitted,


Benjamin J. Otto
Idaho Conservation League

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of March 2013, 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
427 W. Washington St.
Boise, ID 83702-5983

Electronic Mail Only:

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