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IDAHO PUBLIC UTILITIES COMMISSION

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Attorney for the Idaho Conservation League

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE)	
APPLICATION OF PACIFICORP DBA)	CASE NO. PAC-E-14-08
ROCKY MOUNTAIN POWER FOR)	
AUTHORITY TO MAKE REVISIOSN)	PETITION TO INTERVENE
TO ITS ELECTRIC SERVICE)	OF THE
SCHEDULE 155, AGRICULTURAL)	IDAHO CONSERVATION LEAGUE
ENERGY SERVICES)	

The Idaho Conservation League (ICL) requests leave to intervene in this 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 the Commission should grant intervention.

1. The name of this intervenor is:

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. Idaho Conservation League claims a direct and substantial interest in this proceeding arising from our long-term role advocating for public values and the impact to our members served by Rocky Mountain Power. As Idaho's largest state-based conservation organization, we have hundreds of members who are customers of Rocky Mountain Power. ICL and our members have an interest in ensuring the prudent administration of energy efficiency programs to mitigate electric bills and protect Idaho's air, lands, and water. Because this Commission has directed all utilities to pursue all cost-effective efficiency 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. 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 to seek intervenor funding pursuant to IDAPA 31.01.01.161-165.

WHEREFORE, ICL respectfully requests the Commission grant this petition.

Respectfully submitted this 2nd day of October 2014,


Benjamin J. Otto
Idaho Conservation League

CERTIFICATE OF SERVICE

I certify that on the 2nd day of October, 2014, I delivered true and correct copies of the foregoing PETITION TO INTERVENE to the following persons via the method 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:

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