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IDAHO PUBLIC  
UTILITIES COMMISSION

Attorney for the Idaho Conservation League

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF IDAHO POWER )  
COMPANY'S PETITION TO MODIFY )  
TERMS AND CONDITIONS OF )  
PROSPECTIVE PURPA ENERGY SALES )  
AGREEMENTS. )

CASE NO. IPC-E-15-01  
PETITION TO INTERVENE OF THE  
IDAHO CONSERVATION LEAGUE

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  
Idaho Conservation League  
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Boise, Idaho 83702  
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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 the impact to its members served by Idaho Power and to its long-term role advocating for public values. As Idaho's largest state-based conservation organization, we have

approximately 25,000 supporters, most of whom are residential customers of Idaho Power. ICL, as an entity, is a small commercial customer of Idaho Power. ICL and our supporters have an interest in ensuring Idaho Power's electric system provides reliable, fair-priced service that protects the clean air, clean water, and stable climate that are foundational public values for Idahoans. ICL brings a unique and valuable perspective to this proceeding because our members are customers of Idaho Power who support the development of clean energy resources through various means, including energy sales agreements between independent developers and Idaho Power. ICL's intervention will represent our supporters interest in ensuring a fair balance between fostering Idaho's clean energy resources and ensuring fair prices, and thus 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 intends to seek intervenor funding pursuant to IDAPA 31.01.01.161-165.

WHEREFORE, ICL respectfully requests the Commission grant this petition.

DATED this 4th day of February 2015.

Respectfully submitted,



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Benjamin J. Otto  
Idaho Conservation League