

Brad M. Purdy
Attorney at Law
2019 N. 17th St.
Boise, Idaho 83702
(208) 384-1299
Cell: (208) 484-9980
Fax: (208) 384-8511

RECEIVED
2016 SEP 19 PM 3: 04
IDAHO PUBLIC
UTILITIES COMMISSION

September 19, 2016, 2015

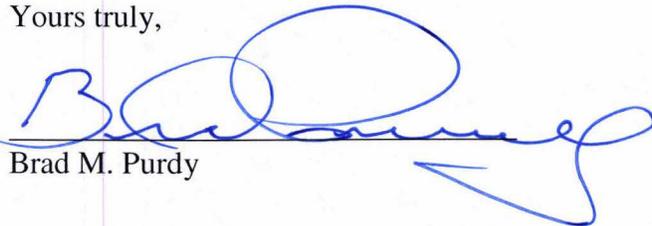
Ms. Jean Jewell
Secretary
Idaho Public Utilities Commission
472 W. Washington
Boise, ID 83702

Re: Case No. INT-G-16-02: Intermountain Gas Company's 2016 General Rate Case

Dear Ms. Jewell:

Enclosed, please find an original and seven (7) copies of Community Action Partnership Association of Idaho's Petition to Intervene in the above-referenced proceeding.

Yours truly,



Brad M. Purdy

Brad M. Purdy
Attorney at Law
Bar No. 3472
2019 N. 17th St.
Boise, ID. 83702
(208) 384-1299 (Land)
(208) 384-8511 (Fax)
bmpurdy@hotmail.com
Attorney for Petitioner
Community Action Partnership
Association of Idaho

RECEIVED
2016 SEP 19 PM 3:04
IDAHO PUBLIC
UTILITIES COMMISSION

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION)	CASE NOS. INT-G-16-02
OF INTERMOUNTAIN GAS COMPANY'S)	
APPLICATION TO CHANGE ITS RATES)	COMMUNITY ACTION
AND CHARGES FOR NATURAL GAS)	PARTNERSHIP ASSOCIATION
IN THE STATE OF IDAHO)	OF IDAHO'S PETITION TO
)	TO INTERVENE
)	
)	

COMES NOW, Community Action Partnership Association of Idaho (hereinafter "CAPAI" or "Intervenor") and, pursuant to Rules 071-076 of the Commission's Rules of Practice and Procedure, IDAPA 31.01.01.071-076, hereby petitions the Commission for leave to intervene in this proceeding and to appear and participate with full party's rights. In support of this Petition, CAPAI states as follows:

1. The address and name of the Petitioner is:

Community Action Partnership Association of Idaho
3350 W. Americana Terrace, Suite 360
Boise, ID. 83706
2. CAPAI will be represented in this proceeding by, and pleadings and other correspondence need only be sent to:

Brad M. Purdy
Attorney at Law
2019 N. 17th St.
Boise, ID. 83702
208-384-1299
Email: bmpurdy@hotmail.com

3. CAPAI is a non-profit corporation whose membership consists of six community action and two special purpose agencies serving every county in Idaho. The mission of CAPAI is to fight the causes and conditions of poverty through building the capacity and effectiveness of its members. CAPAI's members have a direct and substantial interest in this proceeding. The causes of poverty are numerous and disparate, the conditions are exacerbated by decreasing energy affordability caused by increasing utility unit and base rates such as those requested by the Company.

This results in the necessity to make decisions on which basic needs (housing, food, energy or medication) are most important at any given time. 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. In particular, CAPAI has been involved in a considerable number of Intermountain Gas proceedings before this Commission widely ranging in scope in recent years. If granted intervention in this case, CAPAI will address issues of importance to the general body of ratepayers, including the Company's substantial increase in the customer charge and the impact of the proposed customer charge on low income customers.

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 Intermountain'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 19th day of September, 2016.

A handwritten signature in black ink, appearing to read "Brad M. Purdy", written over a horizontal line.

Brad M. Purdy
Attorney for Community Action Partnership Assoc. of Idaho

CERTIFICATE OF SERVICE

I, the undersigned, hereby represent that on this 21st day of June, 2016, caused a true and correct copy of this Petition to Intervene to be served on the following both electronically and via U.S. Mail, First Class, Postage Prepaid (unless otherwise indicated).

Jean Jewell, Secretary:
Idaho Public Utilities Commission
472 W. Washington St.
P.O. Box 83720
Boise, Idaho 83720-0074
jean.jewell@puc.idaho.gov

Clearwater Paper Corporation:
c/o Peter Richardson, Esq.
Richardson Adams, PLLC
515 N. 27th St.
P.O. Box 7218
Boise, ID 83702
peter@richardsonadams.com

Northwest Industrial Gas Users:
Chad Stokes
Tommy Brooks
Cable Huston, LLP
1001 S.W. 5th, Ste 2000
Portland, OR 97204-1136
cstokes@cablehuston.com
tbrooks@cablehuston.com

Michael Creamer
Givens Pursley, LLP
601 W. Bannock St.
Boise, ID 83702
mcc@givenspursley.com

DATED, this 18th day of September, 2016


Brad M. Purdy