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IDAHO PUBLIC UTILITIES COMMISSION

Attorney for the Idaho Conservation League  
and the NW Energy Coalition

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF THE )	
APPLICATION OF INTERMOUNTAIN )	CASE NO. INT-G-16-02
GAS COMPANY FOR THE )	
AUTHORITY TO CHANGE ITS RATES )	PETITION TO INTERVENE
AND CHARGES FOR NAUTRAL GAS )	
SERVICE TO NATURAL GAS )	IDAHO CONSERVATION LEAGUE
CUSTOMERS IN THE STATE OF )	AND THE NW ENERGY COALITION
IDAHO )	

COMES NOW the Idaho Conservation League (“ICL”) the NW Energy Coalition “NVEC” and hereby requests 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 and NVEC have direct and substantial interests in these proceedings, and therefore should be granted intervention.

1. The name of this intervenor is:

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Please provide copies of all pleadings, production requests, production responses,

Commission orders, and other documents to the names and addresses 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 Idaho Conservation League and NW Energy Coalition claim a direct and substantial interest in this proceeding arising from the impact to our members served by Intermountain Gas and to our long-term role advocating for public values. As Idaho's largest state-based conservation organization, ICL has approximately 9,500 members, about half of which are customers of Intermountain Gas. NW Energy Coalition is has more than 110 member organizations throughout Oregon, Washington, Montana, and Idaho. NWECC claims an interest in this case on behalf of our 11 organizational members in Idaho. ICL and NWECC have a direct and substantial interest in expanding of gas conservation in Idaho in order to ensure affordable gas service for our members while reducing environmental harms attributable to fossil fuel production and consumption. As the only potential intervenors in this proceeding advocating for investments, customer incentives, and rate designs specifically intended to fully incentivize gas conservation, and NWECC participation in similar Public Utilities Commission cases across the region, we bring a unique and valuable perspective to this proceeding. Because the Idaho Commission has directed all utilities to pursue all cost effective conservation measures, our intervention will not unduly broaden the issues in this proceeding.

3. ICL and NWECC intend to fully participate in this matter as a party. The nature and quality of our intervention in the proceeding is dependant upon the nature and effect of other evidence in this proceeding. If necessary we may introduce evidence, be heard in argument, and call, examine, and cross-examine witnesses. ICL and NWECC may seek intervenor funding pursuant to IDAPA 31.01.01.161-165.

WHEREFORE, ICL and NWECC respectfully request the Commission grant this petition.

DATED this 21st day of September 2016.

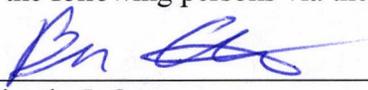
Respectfully submitted,



Benjamin J. Otto  
On behalf of the Idaho Conservation League  
and the NW Energy Coalition

CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of September 2016 I delivered true and correct copies of the foregoing PETITION TO INTERVENE to the following persons via the method of service noted:

  
\_\_\_\_\_  
Benjamin J. Otto

Hand delivery:

Jean Jewell  
Commission Secretary  
Idaho Public Utilities Commission  
427 W. Washington St.  
Boise, ID 83702-5983  
(Original + 7 copies provided)

Electronic Mail:

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