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IDAHO PUBLIC
UTILITIES COMMISSION

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

**PETITION TO INTERVENE IN THE MATTER OF THE APPLICATION OF
INTERMOUNTAIN GAS COMPANY FOR THE AUTHORITY TO CHANGE ITS
RATES AND CHARGES FOR NATURAL GAS SERVICE TO NATURAL GAS
CUSTOMERS IN THE STATE OF IDAHO**

CASE NO. INT-G-16-02

Pursuant to the Idaho Public Utilities Commission's Rules of Procedure Rule 71, IDAPA 31.01.01.071, et seq., and in response to Commission Order No. 33593, the Snake River Alliance petitions the Commission to grant its petition for intervention in the above-referenced case, INT-G-16-02. The name and address of the Intervenor is:

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Pending further notice to the Commission and to Parties, Ken Miller will represent the Snake River Alliance in this proceeding. Correspondence in this docket can be sent to the above address or via email. To reduce costs and environmental impacts of exchanging information in this case, the Alliance requests that, pursuant to IPUC Rules, information other than that which might be deemed confidential or otherwise must be hand-delivered be provided electronically and/or via email to the above address.

The Snake River Alliance is an Idaho-based non-profit organization, established in 1979 to address Idahoans' concerns about nuclear waste and safety issues. In 2007, the Alliance

expanded the scope of its mission by becoming Idaho's first nonprofit clean energy advocacy organization. The Alliance's energy program includes advocacy for renewable energy resources in Idaho; expanded conservation and demand-side management programs offered by Idaho's regulated electric utilities and the Bonneville Power Administration; and development of local, state, regional, and national initiatives to advance sustainable energy policies, including electric utility rate structures and designs that promote energy conservation and serve the interests of residential customers of Idaho's regulated gas and electric utilities. The Alliance pursues these programs on behalf of its members, most of whom are customers of Intermountain Gas Company.

The Alliance has a direct and substantial interest in these proceedings as the Company's request raises policy issues of interest to the Alliance and its members and other Intermountain Gas customers. In particular and with regard to this docket, the Alliance intends to participate in deliberations as they relate to proposals by Intermountain Gas relating to demand-side management (DSM) initiatives; its proposed Fixed Cost Collection Mechanism (FCCM, or "decoupling"); and general rate design issues.

The Alliance believes its participation as an intervenor will not complicate or extend this case, nor will its participation unduly broaden the issues in this case, and that to the extent permitted by Commission rules it will actively participate in this case as an intervenor.

Therefore and pursuant to Rules 72 and 73 of the Commission's Rules of Procedure, IDAPA 31.01.01.072 and 073, the Alliance requests that this petition to participate as an intervenor in Case No. INT-G-16-02 be granted.

Respectfully submitted this 23rd day of September 2016.

Ken Miller
Energy Program Director
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Hand Delivered

Jean Jewell, Commission Secretary

Idaho Public Utilities Commission
472 W. Washington St.
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