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Community Action Partnership  
Association of Idaho

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IDAHO PUBLIC  
UTILITIES COMMISSION

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF THE COMMISSION'S )  
INQUIRY ABOUT ENERGY ) CASE GNR-U-08-01  
AFFORDABILITY ISSUES AND )  
WORKSHOPS ) COMMUNITY ACTION  
 ) PARTNERSHIP ASSOCIA-  
 ) TION OF IDAHO'S  
 ) PETITION TO INTER-  
 ) VENE

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COMES NOW, Community Action Partnership Association of Idaho (hereinafter "CAPAI" or "Intervenor") and, pursuant to Rules 071-075 of the Commission's Rules of Practice and Procedure, IDAPA 31.01.01.071-075, hereby petitions the Commission for leave to formally intervene in this proceeding and to appear and participate with full parties' rights. In support of this Petition, CAPAI states as follows:

1. The address and name of the respective Intervenor is:

Community Action Partnership Association of Idaho  
5400 W. Franklin Rd., Suite G  
Boise, ID. 83705

2. This Intervenor will be represented in this proceeding by, and pleadings and other correspondence need only be sent to:

2019 N. 17<sup>th</sup> St.  
Boise, ID. 83702  
208-384-1299  
FAX: 208-384-8511  
Email: [bmpurdy@hotmail.com](mailto:bmpurdy@hotmail.com)

3. CAPAI is a non-profit corporation consisting of six community action agencies serving every county in Idaho and also includes, among others, the statewide Community Council of Idaho (formerly the Idaho Migrant Council) and fights the causes and conditions of poverty through building the capacity and effectiveness of its members who have a direct and substantial interest in this proceeding. These causes and conditions of poverty include high utility costs for Idaho Power's low income rate payers. Low income families pay a higher percentage of their income for utility expenses than those in other economic categories. These conditions are often caused by living in sub-standard or older housing that is not energy efficient. No other party typically intervenes in proceedings before the Commission, other than CAPAI, that represents the Company's low-income customers. Consequently, CAPAI fulfills an important role in this, and similar proceedings and, without the opportunity to participate as a party in this proceeding, would be unable to fulfill that role.

4. This proceeding (referred to herein as the "Energy Affordability case") was proposed for the purpose of addressing the increasing difficulty of utility customers to pay their electric and natural gas bills. The groundwork for this proceeding was due to a decision memorandum submitted by Staff following settlement negotiations conducted in Case No. AVU-E-08-01 and AVU-G-08-01 (collectively referred to as the "AVISTA case"), during which CAPAI proposed and no party opposed this proceeding, and by the Commission's own motion. During settlement negotiations, all parties agreed that this

was an acceptable provision to incorporate into the settlement agreement in the AVISTA case, but that the Energy Affordability case should be generic in nature ensuring that Idaho Power Company, Rocky Mountain Power Company and Intermountain Gas Company be included as well as AVISTA. Consequently, the Commission issued Order No. 30644, initiating the case at hand.

5. CAPAI intends to participate in this proceeding as a party 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 attendant rights and responsibilities.

DATED, this <sup>d</sup>3 day of October, 2008.

  
Brad M. Purdy