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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

**IN THE MATTER OF ROCKY
MOUNTAIN POWER'S 2015
INTEGRATED RESOURCE PLAN**

Docket No. 15-035-04

**PETITION TO INTERVENE OF
THE IDAHO CONSERVATION
LEAGUE**

Pursuant to Utah Code Ann. § 63G-4-207 and Rule R746-100-7, the Idaho Conservation League (“ICL”) respectfully petitions for leave to intervene in this docket.

In support of this petition, ICL states as follows:

1. The Idaho Conservation League is a non-profit, public interest organization based in Idaho. On behalf of our 25,000 supporters ICL has spent over 40 years advocating for clean water, clean air, and healthy wild places. Today our advocacy includes creating a clean energy future for the Intermountain Region with a primary focus on preventing wasted energy and fostering clean energy production while ensuring reliable and fair priced electricity. Our energy work engages with electric utilities serving Idaho and we regularly intervene before the Idaho Public Utilities Commission including in dockets filed by PacifiCorp/Rocky Mountain Power.

2. ICL seeks intervention before the Utah Public Service Commission in this proceeding regarding PacifiCorp/Rocky Mountain Power’s *2015 Integrated Resource Plan (IRP)* because it is the only effective means to protect our legal rights and interests. This IRP will inform PacifiCorp/Rocky Mountain Power’s future resource decisions including the amount of

energy efficiency and demand response, as well as the balance between clean energy sources and fossil fuels. PacifiCorp/Rocky Mountain Power is claiming that much of the technical and financial information required to formulate and evaluate this IRP is confidential. In order to access this confidential information PacifiCorp/Rocky Mountain Power is requiring IRP participants to sign confidentiality agreements. ICL is not opposed to signing a confidentiality agreement, but any such agreement must reasonably balance protecting confidential information with enabling effective and informed participation in the IRP development process.

For the 2015 IRP, PacifiCorp/Rocky Mountain Power has two very different confidentiality agreements; one for Utah that adheres to standard Commission practices and rules, and another Company drafted agreement that does not adhere to standard Commission practices and rules in any state. This Company drafted confidentiality agreement is unreasonably burdensome and restrictive. For example, the Company drafted agreement would prohibit ICL from making any copies of confidential information even for other employees or consultants who also sign the same agreement. During a confidential IRP meeting, it would prohibit from talking with the person seated next to me, or even asking a question to the IRP presenter based on the confidential information. And it requires ICL to agree to be hauled before any of the six state Commissions for an alleged violation of the agreement. ICL cannot sign this confidentiality agreement without placing the organization at significant risk and without unnecessarily restricting our ability to effectively participate in the IRP process.

ICL is petitioning to intervene before the Utah Public Service Commission so that we may sign the Utah confidentiality agreement and effectively engage in the IRP development process. ICL contacted PacifiCorp/Rocky Mountain Power on January 22, 2015 explaining our issues with Company drafted agreement and offering to sign a standard agreement. The Company did not respond. The Idaho Commission has not indicated any intent to open a docket

to review PacifiCorp/Rocky Mountain Power's IRP until after the document is completed. And in this Idaho review "it is the ongoing planning process we acknowledge, not the conclusions or results."¹ ICL must engage in the IRP development process to ensure the final plan includes a robust consideration of our members' interest who are served by PacifiCorp/Rocky Mountain Power, including members who are Utah residents. The easiest way to do so is to intervene in the Utah PSC process and use the Utah Commission approved confidentiality agreement.

3. Granting ICL intervention will not materially impair the interests of justice and the orderly and prompt conduct of this proceeding. ICL is a regular participant in utility regulatory proceedings and understands the procedural and substantive obligations involved. While ICL and our members share some of the interest of Utah Clean Energy, we also have different interests in terms of energy resources and different members to represent. ICL is currently following the IRP development and understands the issues, the material, and the current status of the process. This petition to intervene will merely allow ICL to have reasonable access to the confidential portions of the IRP so that we can effectively engage in the process while respecting the sensitive information involved.

4. ICL has not fully determined the specific positions it will take or the relief it will seek. ICL seeks to intervene for purposes of protecting its interests as they arise.

5. Notices in this proceeding should be sent to the following:

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¹Order No. 32890 at 12, PAC-E-13-05 (September 11, 2013) (acknowledging PacifiCorp/Rocky Mountain Power's 2013 IRP).

WHEREFORE, the Idaho Conservation League requests leave to intervene in this proceeding to protect its interests as they may arise

DATED this 9th day of February 2015.

/s/ Benjamin Otto
Benjamin J Otto
Idaho Conservation League

CERTIFICATE OF SERVICE
Docket No. 15-035-04

I hereby certify that a true and correct copy of the foregoing was served by email this 9th day of February, 2015 on the following:

ROCKY MOUNTAIN POWER:

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/s/ Benjamin Otto