

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UE 426

In the matter of

Idaho Power Company.,

Request for a General Rate Revision.

NOTICE OF INTERVENTION FOR
COMMUNITY ENERGY PROJECT

Community Energy Project (CEP) respectfully petitions to intervene in this proceeding pursuant to OAR 860-001-0300 and ORS 756.525, to appear and participate as a party with full party status. The grounds for intervention are as follows.

1. Contact Information for Petitioner and designated person(s) for service list:

Community Energy Project
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2. CEP will be represented by counsel (to be included in service list):

Tonia L. Moro (OSB 893160)
Tonia L. Moro, Attorney at Law P.C.
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3. CEP seeks intervention on its own behalf and on behalf of the individuals and communities it serves and represents who are customers of Idaho Power Company (Idaho Power). CEP is not seeking intervention as a member of or in association with any other organization.

4. CEP is a 501(c)(3) community-based organization that represents Oregon's frontline communities, who are vulnerable to the uncertainty posed by climate change and often struggle to pay existing utility bills. CEP's mission is to create a sustainable, equitable, and green future for those communities, because they deserve safe, healthy, and efficient homes, regardless of income. CEP has a vital, direct and substantial interest in this rate case. One of CEP's long-standing projects provides free services focused on safety and energy efficiency from community education and supplies to direct home energy upgrades and repairs. CEP is the low-income facilitator of the Community Solar Program and works directly with low-income customers to help them navigate connecting with these projects. CEP's participation will help ensure that the interests of these communities are represented in this rate revision process. Without CEP's participation, these communities would be without meaningful participation under current rate contested case proceeding rules.

5. CEP's interest in this proceeding stem from its concern with the significant proposed rate increases that will impact the communities it represents. CEP has not yet determined the full extent of the specific relief it will request but it anticipates participating to the extent necessary to avoid disproportionate impacts on low-income and underserved communities of the decisions informing Idaho Power's rates and its requested rates changes. CEP anticipates focusing on issues related to increased energy efficiency, the proposed discount program, and the bases for the increased base meter fee. As understood, the interests of these communities are not

specifically represented by a party with CEP's focus - such as addressing the impacts of climate change to vulnerable communities and utilizing CEP's expertise in policy and implementation of decarbonizing home energy use. CEP's participation will assist the Commission in resolving issues impacting these communities.

6. CEP will contribute its special knowledge and expertise in this docket. CEP has participated in numerous PUC proceedings including Northwest Natural's last general rate case, UG 435 as a member of a coalition, and UE 416, Portland General Electric's recent general rate case. It is experienced in providing testimony and evidence in PUC proceedings. CEP's counsel has over twenty years experience as a trial litigator, and as an appellate and administrative law attorney and has participated in numerous PUC proceedings representing environmental justice organizations.

7. CEP's participation in this docket will not unreasonably broaden the issues, burden the record or unreasonably delay the proceedings underway. Moreover, there is good cause to waive rules and requirements that may otherwise pose barriers to CEP's participation. HB 2475 sets forth specific policy and legislative intent to foster participation in PUC proceedings by environmental justice organizations like CEP. These organizations are only recently building capacity to participate due to the funding made available through that legislation. CEP highlights the importance of having representation for the communities environmental justice organizations represent in rate case proceedings. CEP's ability to represent these customers through intervention ensures their interests are not left behind as rates and programs are developed. In summary, the importance of environmental justice community representation, and the recently evolved program to provide capacity to do so presents good cause to exercise discretion in favor of CEP's participation.

8. Wherefore, CEP respectfully requests that the Commission enter an order granting CEP permission to intervene in this docket and to participate to the full extent allowed by law so that it may fully represent its interests and the interests of the environmental justice communities it represents.

DATED this February 28, 2024.

/s/ Kate Ayres

Kate Ayres

Policy and Advocacy Manager

Community Energy Project

Email: kate@communityenergyproject.org