ROBERT B. LUCE BOISE CITY ATTORNEY

ELIZABETH A. KOECKERITZ Deputy City Attorney BOISE CITY ATTORNEY'S OFFICE 150 N. Capitol Blvd. P.O. Box 500 Boise, ID 83701-0500 Telephone: (208)384-3870 Facsimile: (208)384-4454 Idaho State Bar No. 7670 Email: ekoeckeritz@cityofboise.org

Attorneys for Intervenor

## BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER COMPANY'S APPLICATION FOR APPROVAL OF NEW TARIFF SCHEDULE 63, A COMMUNITY SOLAR PILOT PROGRAM Case No. IPC-E-16-14

PETITION TO INTERVENE OF THE CITY OF BOISE CITY

COMES NOW, the City of Boise City, hereinafter referred to as "Intervenor," and pursuant

to this Commission's Rules of Procedure, Rule 71 IDAPA 3101.01.71 and, pursuant to that Notice

of Application and Notice of Intervention Deadline issued by the Commission on July 7, 2016, in

Order No. 33552, hereby petitions the Commission for leave to intervene herein and to appear and

participate herein as a party, and as grounds therefore states as follows:

1. The name and address of this Intervenor is:

City of Boise City 150 N. Capitol Blvd. P.O. Box 500 Boise, ID 83701-0500

## ORIGINAL

PETITION TO INTERVENE OF THE CITY OF BOISE CITY - 1

RECEIVED 2016 JUL 28 PM 2: 26 IDAHO PUBLIC UTILITIES COMMISSION 2. Copies of all pleadings, production requests, production responses, Commission

orders and other documents should be provided to Elizabeth A. Koeckeritz at:

Elizabeth A. Koeckeritz Deputy City Attorney BOISE CITY ATTORNEY'S OFFICE 150 N. Capitol Blvd. P.O. Box 500 Boise, ID 83701-0500 Telephone: (208)384-3870 Facsimile: (208)384-4454 Idaho State Bar No. 7670 Email: ekoeckeritz@cityofboise.org

3. This Intervenor, the City of Boise City, is a Municipal Corporation organized under the laws of the state of Idaho.

4. Without the opportunity to intervene herein, this Intervenor would be without any means of participation in this proceeding which may have a material impact on the rates that it and its citizens pay for electric service. This outcome of this proceeding affects the environmental, health and economic concerns of the city of Boise City and its citizens.

5. Granting this Intervenor's petition to intervene will not unduly broaden the issues nor will it prejudice any party to this case. As a substantial reason for the delay in the filing of the Petition to Intervene, Intervenor submits that Intervenor's counsel has been out-of-town and unable to be reached.

6. Intervenor intends to full participate in this matter as a party. The nature and quality of the city of Boise City's intervention in this proceeding is dependent upon the nature and effect of other evidence in this proceeding. If necessary, Intervenor may introduce evidence, be heard in argument, and call, examine and cross-examine witnesses.

PETITION TO INTERVENE OF THE CITY OF BOISE CITY - 2

WHEREFORE, the city of Boise City respectfully requests that this Commission grant its Petition to Intervene in these proceedings and to appear and participate in all matters as may be necessary and appropriate; and to present evidence, call and examine witnesses, present argument and to otherwise fully participate in these proceedings.

DATED this 16 day of July 2016.

<u>Underschallocakirt</u> Elizabeth A. Koeckeritz Deputy City Attorney

## **CERTIFICATE OF SERVICE**

I hereby certify that I have on this <u>24</u> day of July 2016, served the foregoing

document on all parties of counsel as follows:

Lisa Nordstrom **Regulatory Dockets** Idaho Power Company 1221 West Idaho St. Boise, ID 83707-0070 lnordstrom@idahopower.com dockets@idahopower.com

Matt Larkin Peter Pengilly Idaho Power Company 1221 West Idaho Street (83702) Boise, ID 83707-0070 mlarkin@idahopower.com ppengilly@idahopwer.com

U.S. Mail

- Personal Delivery
- □ Facsimile
- Electronic Means w/ Consent

• Other:

💋 U.S. Mail

Personal Delivery

- Facsimile
- Electronic Means w/ Consent

Other:

PETITION TO INTERVENE OF THE CITY OF BOISE CITY - 3

Benjamin J. Otto Idaho Conservation League 710 N. 6<sup>th</sup> St. Boise, ID 83702 botto@idahoconservation.org

Jean Jewell **Commission Secretary** Idaho Public Utilities Commission 472 West Washington Boise, ID 83702 jean.jewell@puc.idaho.gov

U.S. Mail

Personal Delivery

- Facsimile
- Electronic Means w/ Consent

Other:

- U.S. Mail

Personal Delivery Ø 

Facsimile

Electronic Means w/ Consent

Other:

h Koeckinle Elizabeth A. Koeckeritz

Deputy City Attorney

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