



## BOISE CITY ATTORNEY'S OFFICE

MAYOR: David H. Bieter | BOISE CITY ATTORNEY: Robert Luce

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IDAHO PUBLIC  
UTILITY COMMISSION

Idaho Public Utilities Commission  
472 W. Washington Street  
Boise, ID 83702

September 6, 2017

RE: Case No. IPC-E-17-13 Idaho Power New Schedules For Customers With On-Site  
Generation

Dear Commissioners:

Please find enclosed the original and seven copies of the City of Boise's Petition to Intervene regarding Idaho Power's proposed new schedules for customers with on-site generation, case number IPC-E-17-13.

If there are any questions regarding the enclosed documents, please contact Abigail Germaine at (208) 608-7956 or via email at [agermaine@cityofboise.org](mailto:agermaine@cityofboise.org).

Sincerely,

Abigail R. Germaine  
Deputy City Attorney

ROBERT B. LUCE  
BOISE CITY ATTORNEY

ABIGAIL R. GERMAINE (ISB No. 9231)  
Deputy City Attorney  
BOISE CITY ATTORNEY'S OFFICE  
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Email: [agermaine@cityofboise.org](mailto:agermaine@cityofboise.org)

Attorneys for Petitioner

**BEFORE THE  
IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF IDAHO POWER  
COMPANY'S APPLICATION FOR  
AUTHORITY TO ESTABLISH NEW  
SCHEDULES FOR RESIDENTIAL AND  
SMALL GENERAL SERVICE CUSTOMERS  
WITH ON-SITE GENERATION

Case No. IPC-E-17-13

CITY OF BOISE CITY  
PETITION TO INTERVENE

COMES NOW, the city of Boise City, hereinafter referred to as "Petitioner," and pursuant to this Commission's Rules of Procedure, Rule 71 IDAPA 3101.01.71 and, pursuant to that Application filed on July 27, 2017, and Notice of Application and Notice of Intervention Deadline, Order No. 33843, filed on August 17, 2017, 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 Petitioner is:

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

2. Copies of all pleadings, production requests, production responses, Commission orders and other documents should be provided to Abigail R. Germaine at:

Abigail R. Germaine  
Deputy City Attorney  
BOISE CITY ATTORNEY'S OFFICE  
150 N. Capitol Blvd.  
P.O. Box 500  
Boise, Idaho 83701-0500  
Telephone: (208) 608-7950  
Facsimile: (208) 384-4454  
Idaho State Bar No. 9231  
Email: [agermaine@cityofboise.org](mailto:agermaine@cityofboise.org)

3. The Petitioner, the city of Boise City, is a Municipal Corporation organized under the laws of the state of Idaho.

4. The Petitioner has a direct and substantial interest in this matter as it maintains solar panel installations, such as those located at the Twenty Mile South Farm Administration and Maintenance Building, which are net metered and, therefore, are potentially affected by these proposed changes. The Petitioner also has an interest in protecting against any potential negative effects the proposed changes will have in discouraging more municipal governments and citizens to install and use solar panels, thereby reducing pollution and furthering the Petitioner's progress in achieving its sustainability goals. The Petitioner has set specific energy use and carbon reduction goals for internal operations based on detailed baselining of current energy use and the implementation of energy efficiency measures in combination with increased installation of renewable energy. The Petitioner's broader sustainability goals are a direct reflection of the comments received from the citizens of Boise City in the course of the Petitioner's

regular citizen survey. The Petitioner has an interest in the economic health of the area which in the future could be dependent on the ability to provide affordable renewable energy to more and more companies who are setting 100% Renewable Energy goals. In addition, considering the abundant natural resources such as geothermal heat and solar access in Boise City, the renewable energy industry has the possibility of being a strong component of a diverse local economy. However, the changes proposed in this matter could have a swift, deleterious effect on the solar installation industry, and render home and building improvements made by the Petitioner and Boise City residents less productive. The outcome of this proceeding affects environmental, health, and economic concerns of Boise City and its citizens.

5. Without the opportunity to intervene herein, the Petitioner 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. If allowed to intervene, the Petitioner will participate in the proceedings and appear in all matters as may be necessary and appropriate; present evidence; call and examine witnesses; present argument; and otherwise fully participate in these proceedings.

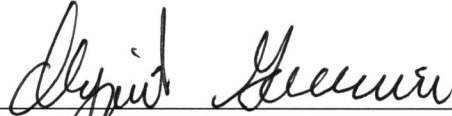
6. Granting the Petitioner's petition to intervene will not unduly broaden the issues, nor will it prejudice any party to this case.

7. Petitioner intends to fully participate in this matter as a party. The nature and quality of the Petitioner's intervention in this proceeding is dependent upon the nature and effect of other evidence in this proceeding. The Petitioner requests that the Commission issue a timely order granting or denying this Petition following the seven-day opposition period set forth

in IDAPA 31.01.01.075. The Petitioner also reserves its right to file for intervenor funding, depending upon the amount of time and resources involved in this matter pursuant to IDAPA 31-01.01.161-165.

WHEREFORE, the Petitioner, the city of Boise City, respectfully requests that this Commission grant this Petition to Intervene.

DATED this 6 day of September 2017.

  
Abigail R. Germaine  
Deputy City Attorney

**CERTIFICATE OF SERVICE**

I hereby certify that I have on this 0<sup>th</sup> day of September, 2017, served the foregoing

documents on all parties of counsel as follows:

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