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IDAHO PUBLIC  
UTILITIES COMMISSION

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Attorney for Intervenor

**BEFORE THE  
IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF THE PETITION OF  
IDAHO POWER COMPANY TO STUDY THE  
COSTS, BENEFITS, AND COMPENSATION  
OF NET EXCESS ENERGY SUPPLIED BY  
CUSTOMER ON-SITE GENERATION

Case No. IPC-E-18-15

CITY OF BOISE CITY'S  
PETITION FOR LEAVE TO  
INTERVENE

COMES NOW, the city of Boise City, herein referred to as "Intervenor," and pursuant to Rules 71 through 73 of the Rules of Procedure of the Idaho Public Utility Commission (IDAPA 31.01.01.71 – 31.01.0.73) and, pursuant to that Petition filed on October 19, 2018, and Notice of Petition and Notice of Intervention Deadline, Order No. 34189, filed on November 9, 2018, hereby petitions the Commission for leave to intervene herein and to appear and participate as a party, and as basis 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

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.  
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Idaho State Bar No. 9231  
Email: [agermaine@cityofboise.org](mailto:agermaine@cityofboise.org)

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

4. The Intervenor 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, is invested in a thorough study of the appropriate costs and benefits of excess solar generation. The Intervenor also has an interest in ensuring on-site solar generation rates and programs are fair, just and equitable and encourage more municipal governments and citizens to install and use solar panels, thereby reducing pollution and furthering the Intervenor's progress in achieving its sustainability goals. The Intervenor 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 Intervenor's broader sustainability goals are a reflection of the comments and feedback received from the citizens of Boise City in the course of the Intervenor's various community engagement processes. The

Intervenor 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. The outcome of this proceeding affects environmental, health, and economic concerns of Boise City and its citizens.

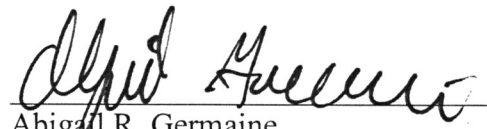
5. Without the opportunity to intervene herein, the Intervenor would be without any means of participation in this proceeding which may eventually have a material impact on the rates that it and its citizens pay for electric service. If allowed to intervene, the Intervenor will participate in the proceedings 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 Intervenor's petition to intervene will not unduly broaden the issues, nor will it prejudice any party to this case.

7. Intervenor intends to fully participate in this matter as a party. The nature and quality of the Intervenor's intervention in this proceeding is dependent upon the nature and effect of other evidence in this proceeding. The Intervenor requests that the Commission issue a timely order granting or denying this Petition for Leave to Intervene 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 Intervenor, the city of Boise City, respectfully requests that this Commission grant this Petition for Leave to Intervene.

DATED this 28 day of November 2018.

  
Abigail R. Germaine  
Deputy City Attorney

### CERTIFICATE OF SERVICE

I hereby certify that I have on this 28 day of November 2018, served the foregoing documents on all parties of counsel as follows:

Diane Hanian  
Commission Secretary  
Idaho Public Utilities Commission  
472 West Washington  
Boise, ID 83702  
[diane.holt@puc.idaho.gov](mailto:diane.holt@puc.idaho.gov)

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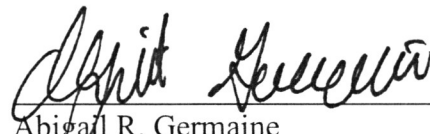
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Deputy City Attorney