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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 FIXED COSTS OF PROVIDING ELECTRIC SERVICE TO CUSTOMERS

Case No. IPC-E-18-16

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. 34190, 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

CITY OF BOISE'S PETITION FOR LEAVE TO INTERVENE - 1

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

- 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 a customer with numerous Boise City owned facilities served by Idaho Power and on behalf of all the citizens of Boise City. The Intervenor has an interest in ensuring that fair, just, and equitable rates and charges for electricity are established and encourage more municipal governments and citizens to efficiently use and conserve resources. The Intervenor has an interest in the economic health of the area which is effected by the accurate and equitable determination and recovery of fixed costs by Idaho Power. 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 will 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 2 day of November 2018.

Abigail R. Germaine Deputy City Attorney

## **CERTIFICATE OF SERVICE**

I hereby certify that I have on this <u>38</u> 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	U.S. Mail Personal Delivery Facsimile Electronic Means Other:
Lisa Nordstrom Regulatory Dockets Idaho Power Company PO Box 70 Boise, ID 83707 Inordstrom@idahopower.com dockets@idahopower.com	U.S. Mail Personal Delivery Facsimile Electronic Means Other:
Timothy E. Tatum Connie Aschenbrenner Idaho Power Company PO Box 70 Boise, ID 83707 ttatum@idahopower.com	U.S. Mail Personal Delivery Facsimile Electronic Means Other:
caschenbrenner@idahopower.com  C Tom Arkoosh Attorney for IdaHydro ARKOOSH LAW OFFICES PO Box 2900 Boise, ID 83701 tom.arkoosh@arkoosh.com erin.cecil@arkoosh.com	U.S. Mail Personal Delivery Facsimile Electronic Means Other:
Benjamin J. Otto Attorney for Idaho Conservation League and NW Energy Coalition 710 N. 6 <sup>th</sup> Street Boise, ID 83701 botto@idahoconservation.org	U.S. Mail Personal Delivery Facsimile Electronic Means Other:

Eric L. Olsen Attorney for Idaho Irrigation Pumpers Assn., Inc. Echo Hawk & Olsen, PLLC 505 Pershing Ave. Ste. 100 PO Box 6119 Pocatello, ID 83205 elo@echohawk.com	U.S. Mail Personal Delivery Facsimile Electronic Means Other:
Yvonne R. Hogle Ted Weston Rocky Mountain Power 1407 West North Temple, Suite 320 Salt Lake City, UT 84116 Yvonne.hogle@pacificorp.com Ted.weston@pacificorp.com	U.S. Mail Personal Delivery Facsimile Electronic Means Other:
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David J. Meyer Vice President & Chief Counsel of Regulatory and Governmental Affairs AVISTA CORPORATION 1411 E. Mission Ave. P.O. Box 3727 Spokane, WA 99220	U.S. Mail Personal Delivery Facsimile Electronic Means Other:

Abigall R. Germaine Deputy City Attorney

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