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Attorney for Intervenor

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IDAHO PUBLIC  
UTILITIES COMMISSION

**BEFORE THE  
IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF IDAHO POWER  
COMPANY'S APPLICATION TO EVALUATE  
SCHEDULE 84 – NET METERING

Case No. IPC-E-19-15

**CITY OF BOISE CITY'S  
PETITION FOR LEAVE TO  
INTERVENE**

COMES NOW, the city of Boise City, herein referred to as "Boise City" 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 Application filed on April 5, 2019, and Notice of Application and Notice of Intervention Deadline, Order No. 34301, filed on April 18, 2019, 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  
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In the interest of reducing costs to all parties, please provide hard copies of pleading, testimony, and briefs only. All other production requests, response, notices, Commission orders and other filings may be submitted via electronic mail in accordance with Rule 63 of the Rules of Procedure of the Idaho Public Utility Commission (IDAPA 31.01.01.063).

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

4. Boise City has a direct and substantial interest in this matter as Boise City itself is a Large General 09S net metering customer taking service under Schedule 84. Both Boise City's Twenty Mile South Farm Administration Building (the first zero-net energy building in the state of Idaho) and the Foothills Learning Center are Large General Service buildings under Schedule 84 and are potentially directly impacted by proposed changes to Schedule 84. Boise City has set a municipal goal of achieving 100% clean electricity use for Boise City operations by 2030. Net metering for Boise City facilities could play a key role in accomplishing this goal.

5. Likewise, Boise City also has an interest in protecting against the negative impacts the proposed changes in this Application would have in discouraging or precluding others who take service as commercial, industrial, and irrigation customers and wish to participate in on-site generation, thereby reducing pollution and furthering Boise City's progress in achieving its Boise City community wide goal of 100% clean electricity by 2035.

6. In addition, Boise City was a party to docket IPC-E-17-13, moving residential and small general service customers with on-site generation into Schedules 6 and 8 and was heavily involved with that proceeding, providing direct testimony and producing evidence.

7. Boise City is currently a party to the two other dockets referenced in this Application, IPC-E-18-15 and IPC-E-18-16. Boise City is currently, and intends to continue, actively participating in these dockets, which requires substantial time and resources. Boise City has a direct and substantial interest in assuring these two dockets are managed conjunctively in the most efficient way possible with this Application.

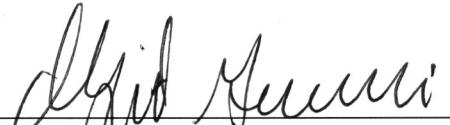
8. Without the opportunity to intervene herein, Boise City would be without any means of participation in this proceeding which will have a negative impact on Boise City facilities and operations as well as other Boise City customers taking service under Schedule 84. If allowed to intervene, Boise City 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.

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

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

DATED this 23 day of April 2019.

  
Abigail R. Germaine  
Deputy City Attorney

### CERTIFICATE OF SERVICE

I hereby certify that I have on this 23 day of April 2019, served the foregoing documents on all parties of counsel as follows:

Lisa Nordstrom  
Timothy E. Tatum  
Connie Aschenbrenner  
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Idaho Power Company  
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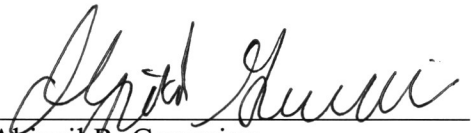
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Abigail R. Germaine  
Deputy City Attorney