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Attorney for Intervenor

**BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF IDAHO POWER
COMPANY'S APPLICATION FOR A
DETERMINATION OF 2019 DEMAND-SIDE
MANAGEMENT EXPENSES AS PRUDENTLY
INCURRED

Case No. IPC-E-20-15

**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 March 13, 2020, and Notice of Application and Notice of Intervention Deadline, Order No. 34620, filed on April 6, 2020, 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.
P.O. Box 500
Boise, Idaho 83701-0500
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Facsimile: (208) 384-4454
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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, responses, 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 has a strong interest in promoting demand-side management throughout the community. Boise City has established aggressive energy goals, including demand-side management goals as part of Boise City's community-wide goal of 100% clean electricity by 2035. Specifically, Boise City committed to increasing customer participation in efficiency and demand-side management programs beginning in 2019 and achieving an annual electricity use reduction of approximately 2% by 2030 and beyond. Ensuring demand-side management programs are prudent, innovative,

and abundant is critical to Boise City meeting its goals. Therefore, Boise City encourages the pursuit of any and all cost-effective demand-side management programs, including the development of new programs. The outcome of this proceeding potentially affects environmental, health, and economic concerns of Boise City and its citizens.

5. Without the opportunity to intervene herein, Boise City would be without any means of participation in this proceeding, which may have a negative impact on demand-side management programming offered by Idaho Power Company (“IPC”). 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.

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

7. 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 23rd day of April 2020.



Abigail R. Germaine
Deputy City Attorney

CERTIFICATE OF SERVICE

I hereby certify that I have on this 23rd day of April 2020, served the foregoing documents on all parties of counsel as follows:

Diane Hanian,
Commission Secretary
Idaho Public Utilities Commission
11331 West Chinden Boulevard
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Boise, ID 83714
diane.holt@puc.idaho.gov

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Abigail R. Germaine
Deputy City Attorney