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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 IDAHO POWER  
COMPANY'S APPLICATION FOR A  
DETERMINATION OF 2020 DEMAND-SIDE  
MANAGEMENT EXPENSES AS PRUDENTLY  
INCURRED

Case No. IPC-E-21-04

**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), the Application filed on March 15, 2021, and Notice of Application and Notice of Intervention Deadline, Order No. 34986, filed on April 6, 2021, hereby requests leave to intervene in this matter and to appear and participate as a party. As grounds, Boise City 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 Mary Grant at:

Mary Grant  
Deputy City Attorney  
BOISE CITY ATTORNEY'S OFFICE  
150 N. Capitol Blvd.  
P.O. Box 500  
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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 representing the public interest of Idaho Power Company ("Idaho Power") customers that make up its constituency. Boise City has established aggressive energy goals, including increasing customer participation in demand side management and energy efficiency programs, as part of Boise City's community-wide aspiration of 100% clean electricity by 2035. Ensuring demand side management programs are prudent, innovative, and abundant is critical to Boise City meeting its goals. The pursuit of all

cost-effective demand side management programs includes a review of efficacy and prudence of the current efforts, as well as the development of new programs, in partnership with the utility provider. The outcome of this proceeding impacts the environmental, health, and economic concerns of Boise City and its citizens.

Without the opportunity to intervene herein, Boise City would not have the direct means of ensuring that demand side management programming offered by Idaho Power is guided in a manner such that the impact is positive.

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

6. Boise City intends to fully participate in this matter as a party and appear in all matters as is appropriate. 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. If necessary, Boise City may present evidence; call and examine witnesses; and present argument. 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.

7. Boise City asks that the Commission grant this Petition for Leave to Intervene, not timely filed under Order No. 34986 entered April 6, 2021, which directed the deadline for intervention to be 21 days from the date of such order, for the following reasons:

- a. The Commission's Rule of Procedure 73, IDAPA 31.01.01.072, provides that petitions to intervene shall be filed at least fourteen (14) days before the date set for hearing or prehearing, unless otherwise provided by notice or order. As no such hearing has been set, the Petitioner and any other intervenors are not

prejudiced by the two-day delay in filing and there is no disruption in proceedings.

- b. The City has good cause for the negligible delay, the reason being staff attrition, transitions in position roles and responsibilities, and onboarding of new members.

WHEREFORE, the city of Boise City, respectfully requests that this Commission grant this Petition for Leave to Intervene and issue a timely order as set forth in IDAPA 31.01.01.075.

DATED this 29th day of April 2021.



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Mary Grant  
Deputy City Attorney

**CERTIFICATE OF SERVICE**

I hereby certify that I have on this 29th day of April 2021, served the foregoing documents on all parties of counsel as follows:

Jan Noriyuki  
Commission Secretary  
Idaho Public Utilities Commission  
472 West Washington  
Boise, ID 83702  
[jan.noriyuki@puc.idaho.gov](mailto:jan.noriyuki@puc.idaho.gov)

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Mary Grant  
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