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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 ACKNOWLEDGING ITS
NORTH VALMY POWER PLANT EXIT DATE

Case No. IPC-E-21-12

**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 April 30, 2021, and Notice of Application and Notice of Intervention Deadline, Order No. 35051, filed on May 21, 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
Boise, Idaho 83701-0500
Telephone: (208) 608-7950
Facsimile: (208) 384-4454
Idaho State Bar No. 8744
Email: mrgrant@cityofboise.org
boisecityattorney@cityofboise.org

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 is also a large Idaho Power customer with Schedule 7, 9, and 19 electric service accounts. As an Idaho Power customer with expressed clean energy preferences, this proceeding directly impacts Boise City's access to a clean energy resource mix and has the potential to impact electric service rates. While Boise City is actively engaged in Idaho Power's 2021 Integrated Resource Plan Advisory Council, Boise City's participation herein, if granted, will address the process, analysis, and proposal presented in the Application, recognizing the inherent connection between the two proceedings. Without the opportunity to intervene herein, Boise City would not

have the direct means of ensuring the outcome of this proceeding positively impacts the environmental, health, and economic concerns of Boise City and its citizens. Granting Boise City's petition to intervene will not unduly broaden the issues, nor will it prejudice any party to this case.

5. 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.

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 10th day of June 2021.



Mary Grant
Deputy City Attorney

CERTIFICATE OF SERVICE

I hereby certify that I have on this 11th day of June 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	<input type="checkbox"/> U.S. Mail <input type="checkbox"/> Personal Delivery <input type="checkbox"/> Facsimile <input checked="" type="checkbox"/> Electronic Means w/ Consent <input type="checkbox"/> Other: _____
Lisa Nordstrom Idaho Power Company PO Box 70 Boise, ID 83707 lnordstrom@idahopower.com dockets@idahopower.com	<input type="checkbox"/> U.S. Mail <input type="checkbox"/> Personal Delivery <input type="checkbox"/> Facsimile <input checked="" type="checkbox"/> Electronic Means w/ Consent <input type="checkbox"/> Other: _____
Matt Larkin Idaho Power Company PO Box 70 Boise, ID 83707 mlarkin@idahopower.com	<input type="checkbox"/> U.S. Mail <input type="checkbox"/> Personal Delivery <input type="checkbox"/> Facsimile <input checked="" type="checkbox"/> Electronic Means w/ Consent <input type="checkbox"/> Other: _____
Peter Richardson Industrial Customers of Idaho Power Richardson Adams, PLLC PO Box 7218 Boise ID, 83702 peter@richardsonadams.com	<input type="checkbox"/> U.S. Mail <input type="checkbox"/> Personal Delivery <input type="checkbox"/> Facsimile <input checked="" type="checkbox"/> Electronic Means w/ Consent <input type="checkbox"/> Other: _____
Dr. Don Reading 6070 Hill Road Boise, ID 83703 dreading@mindspring.com	<input type="checkbox"/> U.S. Mail <input type="checkbox"/> Personal Delivery <input type="checkbox"/> Facsimile <input checked="" type="checkbox"/> Electronic Means w/ Consent <input type="checkbox"/> Other: _____
Benjamin Otto Idaho Conservation League 710 N. 6 th St. Boise, ID 83702 botto@idahoconservation.org	<input type="checkbox"/> U.S. Mail <input type="checkbox"/> Personal Delivery <input type="checkbox"/> Facsimile <input checked="" type="checkbox"/> Electronic Means w/ Consent <input type="checkbox"/> Other: _____



Mary Grant, Deputy City attorney