

JAYME B. SULLIVAN
BOISE CITY ATTORNEY

Ed Jewell (ISB No. 10446)
Deputy City Attorney
BOISE CITY ATTORNEY'S OFFICE
150 N. Capitol Blvd.
P.O. Box 500
Boise, ID 83701-0500
Telephone: (208) 608-7950
Facsimile: (208) 384-4454
Email: ejewell@cityofboise.org
boisecityattorney@cityofboise.org

Attorney for Intervenor

**BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF IDAHO POWER
COMPANY'S APPLICATION TO INITIATE A
MULTI-PHASE COLLABORATIVE PROCESS
FOR THE STUDY, COSTS, BENEFITS, AND
COMPENSATION OF NET EXCESS ENERGY
ASSOCIATED WITH CUSTOMER ON-SITE
GENERATION

Case No. IPC-E-21-21

**CITY OF BOISE CITY'S
PETITION 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 – 31.01.07.73), the Application filed on June 28, 2021, and Notice of Application and Notice of Intervention Deadline, Order No. 35121, filed on July 27, 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 Ed Jewell at:

Ed Jewell
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
Email: ejewell@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. Boise City also maintains multiple solar panel installations and net metering facilities, such as those located at the Twenty Mile South Farm Administration and Maintenance Building. As an Idaho Power customer with expressed clean energy preferences, this proceeding directly impacts Boise City's ability to meet its goals for local production from distributed energy resources. 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.

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

DATED this 17th day of August 2021.

A handwritten signature in blue ink, appearing to read "Ed Jewell", is written over a horizontal line.

Ed Jewell,
Deputy City Attorney

CERTIFICATE OF SERVICE

I hereby certify that I have on this 17th day of August 2021, served the foregoing documents on all parties of record as follows:

Jan Noriyuki
Commission Secretary
Idaho Public Utilities Commission
11331 W. Chinden Blvd., Ste. 201-A
Boise, ID 83714
jan.noriyuki@puc.idaho.gov

- ☐ U.S. Mail
- ☐ Personal Delivery
- ☐ Facsimile
- ☒ Electronic
- ☐ Other: _____

Erick Shaner
Deputy Attorney General
Idaho Public Utilities Commission
11331 W. Chinden Blvd., Ste. 201-A
Boise, ID 83714
erick.shaner@puc.idaho.gov

- ☐ U.S. Mail
- ☐ Personal Delivery
- ☐ Facsimile
- ☒ Electronic
- ☐ Other: _____

Lisa Nordstrom
Connie Aschenbrenner
Idaho Power Company
PO Box 70
Boise, ID 83707
lnordstrom@idahopower.com
caschenbrenner@idahopower.com
dockets@idahopower.com

- ☐ U.S. Mail
- ☐ Personal Delivery
- ☐ Facsimile
- ☒ Electronic
- ☐ Other: _____

Peter Richardson
Richardson Adams, PLLC
PO Box 7218
Boise ID, 83702
peter@richardsonadams.com
for Industrial Customers of Idaho Power

- ☐ U.S. Mail
- ☐ Personal Delivery
- ☐ Facsimile
- ☒ Electronic
- ☐ Other: _____

Dr. Don Reading
6070 Hill Rd.
Boise, ID 83703
dreading@mindspring.com
for Industrial Customers of Idaho Power

- ☐ U.S. Mail
- ☐ Personal Delivery
- ☐ Facsimile
- ☒ Electronic
- ☐ Other: _____

Benjamin Otto
710 N. 6th St.
Boise, ID 83702
botto@idahoconservation.org
for Idaho Conservation League

- ☐ U.S. Mail
- ☐ Personal Delivery
- ☐ Facsimile
- ☒ Electronic
- ☐ Other: _____

Kevin King
Board President
PO Box 2264
Boise, ID 83702
staff@idahocleanenergy.org
for Idaho Clean Energy Association
C. Tom Arkoosh
Arkoosh Law Offices
PO Box 2900
Boise, ID 83701
tom.arkoosh@arkoosh.com
erin.cecil@arkoosh.com
for IdaHydro

- | | |
|-------------------------------------|-------------------|
| <input type="checkbox"/> | U.S. Mail |
| <input type="checkbox"/> | Personal Delivery |
| <input type="checkbox"/> | Facsimile |
| <input checked="" type="checkbox"/> | Electronic |
| <input type="checkbox"/> | Other: _____ |
| | |
| <input type="checkbox"/> | U.S. Mail |
| <input type="checkbox"/> | Personal Delivery |
| <input type="checkbox"/> | Facsimile |
| <input checked="" type="checkbox"/> | Electronic |
| <input type="checkbox"/> | Other: _____ |



Michelle Steel,
Paralegal