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Attorney for Intervenor

**BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF IDAHO POWER
COMPANY'S APPLICATION FOR A
CERTIFICATE OF PUBLIC CONVENIENCE
AND NECESSITY TO ACQUIRE RESOURCES
TO BE ONLINE BY 2024 AND FOR
APPROVAL OF A POWER PURCHASE
AGREEMENT WITH FRANKLIN SOLAR LLC

Case No. IPC-E-23-05

**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 Utilities Commission (IDAPA 31.01.01.71 – 31.01.0.73), the Application filed on February 17, 2023, and the Notice of Application and Intervention Deadline, Order No. 35701, hereby requests 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 sent to the following:

Darrell Early
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Wil Gehl
Energy Program Manager
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Pursuant to Order No. 35375, Commission Rules 61 and 62 are suspended and all service in this docket, except for voluminous discovery-related documents, is to be completed electronically. If the Commission decides to return to hard copy service during this docket, Boise City requests hard copies of pleading, testimony, and briefs only. All other production requests, response, notices, Commission orders and other filings may be served on Boise City 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 representing its constituents, who are customers of Idaho Power Company ("Idaho Power") and will be impacted by the decisions made in this docket. 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. Additionally, Boise City is an Idaho Power customer with expressed clean

energy preferences. This proceeding may impact Boise City's ability to meet its clean energy goals through utility-scale renewable 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 28th day of March 2023.



Darrell Early,
Deputy City Attorney

CERTIFICATE OF SERVICE

I hereby certify that I have on this 28th day of March 2023, 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: _____

Chris Burdin
Deputy Attorney General
Idaho Public Utilities Commission
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Michelle Steel,
Paralegal