

JAYME B. SULLIVAN  
BOISE CITY ATTORNEY

Darrell Early ISB No. 4748  
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: [BoiseCityAttorney@cityofboise.org](mailto:BoiseCityAttorney@cityofboise.org)  
[dearly@cityofboise.org](mailto:dearly@cityofboise.org)

Attorney for Intervenor

**BEFORE THE  
IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF IDAHO POWER  
COMPANY'S APPLICATION FOR  
AUTHORITY TO IMPLEMENT CHANGES TO  
THE COMPENSTION STRUCTURE  
APPLICABLE TO CUSTOMER ON-SITE  
GENERATION UNDER SCHEDULES 6, 8,  
AND 84 NAD TO ESTABLISH AN EXPORT  
CREDIT RATE METHODOLOGY

Case No. IPC-E-23-14

**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 May 1, 2023, and the Notice of Application and Intervention Deadline, Order No. 35790, 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  
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) 38404454  
Email: [BoiseCityAttorney@cityofboise.org](mailto:BoiseCityAttorney@cityofboise.org)  
[dearly@cityofboise.org](mailto:dearly@cityofboise.org)

Wil Gehl  
Energy Program Manager  
BOISE CITY DEPT. OF PUBLIC WORKS  
150 N. Capitol Blvd.  
P.O. Box 500  
Boise, Idaho 83701-0500  
Telephone: (208) 608-7571  
Email: [wgehl@cityofboise.org](mailto:wgehl@cityofboise.org)

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.

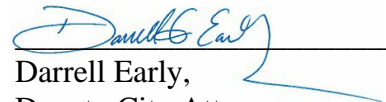
4. Boise City has a direct and substantial interest in representing its constituents, who are customers of Idaho Power Company ("Idaho Power") and will be impacted by the decisions made in this docket. Boise City is also a large Idaho Power customer with Schedule 7, 9, and 19 electric service accounts. 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 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 9th day of June 2023.

  
\_\_\_\_\_  
Darrell Early,  
Deputy City Attorney

**CERTIFICATE OF SERVICE**

I hereby certify that I have on this 9th day of June 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](mailto:jan.noriyuki@puc.idaho.gov)

- U.S. Mail
- Personal Delivery
- Facsimile
- Electronic
- Other: \_\_\_\_\_

Chris Burdin  
Deputy Attorney General  
Idaho Public Utilities Commission  
11331 W. Chinden Blvd., Ste. 201-A  
Boise, ID 83714  
[chris.burdin@puc.idaho.gov](mailto:chris.burdin@puc.idaho.gov)

- U.S. Mail
- Personal Delivery
- Facsimile
- Electronic
- Other: \_\_\_\_\_

Lisa D. Nordstrom  
Megan Goicoechea Allen  
Idaho Power Company  
PO Box 70  
Boise, ID 83707  
[lnordstrom@idahopower.com](mailto:lnordstrom@idahopower.com)  
[mgoicoecheaallen@idahopower.com](mailto:mgoicoecheaallen@idahopower.com)  
[dockets@idahopower.com](mailto:dockets@idahopower.com)

- U.S. Mail
- Personal Delivery
- Facsimile
- Electronic
- Other: \_\_\_\_\_

Tim Tatum  
Connie Aschenbrenner  
Grant Anderson  
Idaho Power Company  
PO Box 70  
Boise, ID 83707  
[ttatum@idahopower.com](mailto:ttatum@idahopower.com)  
[caschenbrenner@idahopower.com](mailto:caschenbrenner@idahopower.com)  
[ganderson@idahopower.com](mailto:ganderson@idahopower.com)

- U.S. Mail
- Personal Delivery
- Facsimile
- Electronic
- Other: \_\_\_\_\_

Marie Callaway Kellner  
Idaho Conservation League  
710 N. 6<sup>th</sup> St.  
Boise, ID 83702  
[mkellner@idahoconservation.org](mailto:mkellner@idahoconservation.org)

- U.S. Mail
- Personal Delivery
- Facsimile
- Electronic
- Other: \_\_\_\_\_

Brad Heusinkveld  
Idaho Conservation League  
710 N. 6<sup>th</sup> St.  
Boise, ID 83702  
[bheusinkveld@idahoconservation.org](mailto:bheusinkveld@idahoconservation.org)

- U.S. Mail
- Personal Delivery
- Facsimile
- Electronic
- Other: \_\_\_\_\_

Eric L. Olsen  
Echo Hawk & Olsen, PLLC  
505 Pershing Ave., Ste. 100  
P.O. Box 6119  
Pocatello, Idaho 83205  
[elo@echohawk.com](mailto:elo@echohawk.com)

- U.S. Mail
- Personal Delivery
- Facsimile
- Electronic
- Other: \_\_\_\_\_

Lance Kaufman, Ph.D.  
2623 NW Bluebell Place  
Corvallis, OR 97330  
[lance@aegisinsight.com](mailto:lance@aegisinsight.com)

- U.S. Mail
- Personal Delivery
- Facsimile
- Electronic
- Other: \_\_\_\_\_

C. Tom Arkoosh  
IdaHydro  
Arkoosh Law Offices  
913 W. River Street, Suite 450  
Boise, ID 83701  
[tom.arkoosh@arkoosh.com](mailto:tom.arkoosh@arkoosh.com)  
[erin.cecil@arkoosh.com](mailto:erin.cecil@arkoosh.com)

- U.S. Mail
- Personal Delivery
- Facsimile
- Electronic
- Other: \_\_\_\_\_

Courtney White  
Mike Heckler  
Clean Energy Opportunities for Idaho  
3778 Plantation River Dr. Suite 102  
Boise, ID 83703  
[courtney@cleanenergyopportunities.com](mailto:courtney@cleanenergyopportunities.com)  
[mike@cleanenergyopportunities.com](mailto:mike@cleanenergyopportunities.com)

- U.S. Mail
- Personal Delivery
- Facsimile
- Electronic
- Other: \_\_\_\_\_

Kelsey Jae  
Law for Conscious Leadership  
920 N. Clover Dr.  
Boise, ID 83703  
[kelsey@kelseyjae.com](mailto:kelsey@kelseyjae.com)

- U.S. Mail
- Personal Delivery
- Facsimile
- Electronic
- Other: \_\_\_\_\_

Jim Swier  
Micron Technology, Inc.  
8000 South Federal Way  
Boise, ID 83707  
[jswier@micron.com](mailto:jswier@micron.com)

- U.S. Mail
- Personal Delivery
- Facsimile
- Electronic
- Other: \_\_\_\_\_

Austin Rueschhoff  
Thorvald A. Nelson  
Austin W. Jensen  
Holland & Hart, LLP  
555 17<sup>th</sup> St. Suite 3200  
Denver, CO 80202  
[darueschhoff@hollandhart.com](mailto:darueschhoff@hollandhart.com)  
[tnelson@hollandhart.com](mailto:tnelson@hollandhart.com)  
[awjensen@hollandhart.com](mailto:awjensen@hollandhart.com)  
[aclee@hollandhart.com](mailto:aclee@hollandhart.com)  
[clmoser@hollandhart.com](mailto:clmoser@hollandhart.com)

- U.S. Mail
- Personal Delivery
- Facsimile
- Electronic
- Other: \_\_\_\_\_



---

Michelle Steel,  
Paralegal