

☑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: [BoiseCityAttorney@cityofboise.org](mailto:BoiseCityAttorney@cityofboise.org)  
[ejewell@cityofboise.org](mailto:ejewell@cityofboise.org)

Attorney for Intervenor

**BEFORE THE  
IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF IDAHO POWER  
COMPANY'S APPLICATION FOR APPROVAL  
OF A CLEAN ENERGY YOUR WAY  
CONSTRUCTION AGREEMENT WITH THE  
CITY OF BOISE AND THE FIRST  
AMENDMENT THERETO

Case No. IPC-E-24-18

**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 April 23, 2024, and the Notice of Application and Intervention Deadline, Order No. 36170, 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:

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) 38404454  
Email: [BoiseCityAttorney@cityofboise.org](mailto:BoiseCityAttorney@cityofboise.org)  
[ejewell@cityofboise.org](mailto:ejewell@cityofboise.org)

Steven Hubble  
Climate Action Senior Manager  
BOISE CITY DEPT. OF PUBLIC WORKS  
150 N. Capitol Blvd.  
P.O. Box 500  
Boise, Idaho 83701-0500  
Telephone: (208) 608-7521  
Email: [shubble@cityofboise.org](mailto:shubble@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 this docket as the participating customer in the proposed Clean Energy Your Way Construction Agreement with Idaho Power. Additionally, Boise City is a large Idaho Power customer with Schedule 7, 9, and 19 electric service accounts with expressed clean energy preferences. This proceeding will impact Boise City's ability to meet its clean energy goals through voluntary clean energy procurement. 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 22nd day of May 2024.

  
\_\_\_\_\_  
Ed Jewell,  
Deputy City Attorney

**CERTIFICATE OF SERVICE**

I hereby certify that I have on this 22nd day of May 2024, served the foregoing documents on all parties of record as follows:

Monica Barrios-Sanchez  
Commission Secretary  
Idaho Public Utilities Commission  
11331 W. Chinden Blvd., Ste. 201-A  
Boise, ID 83714  
[secretary@puc.idaho.gov](mailto:secretary@puc.idaho.gov)

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

Adam Triplett  
Deputy Attorney General  
Idaho Public Utilities Commission  
11331 W. Chinden Blvd., Ste. 201-A  
Boise, ID 83714  
[adam.triplett@puc.idaho.gov](mailto:adam.triplett@puc.idaho.gov)

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

Donovan Walker  
Idaho Power Company  
PO Box 70  
Boise, ID 83707  
[dwalker@idahopower.com](mailto:dwalker@idahopower.com)  
[dockets@idahopower.com](mailto:dockets@idahopower.com)

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

Tim Tatum  
Alison Williams  
Idaho Power Company  
PO Box 70  
Boise, ID 83707  
[ttatum@idahopower.com](mailto:ttatum@idahopower.com)  
[awilliams@idahopower.com](mailto:awilliams@idahopower.com)

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



Michelle Steel,  
Paralegal