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IDAHO PUBLIC  
UTILITIES COMMISSION

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Attorneys for Intermountain Gas Company

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE  
APPLICATION OF  
INTERMOUNTAIN GAS COMPANY  
FOR AUTHORITY TO REVISE ITS  
GENERAL SERVICE PROVISIONS  
RELATED TO THE INSTALLATION  
AND EXTENSION OF NATURAL  
GAS MAINS AND SERVICES.

Case No. INT-G-20-01

**RESPONSE TO CITY OF  
BOISE'S PETITION FOR  
LEAVE TO INTERVENE**

Pursuant to Rule 75 of the Idaho Public Utilities Commission ("Commission"), IDAPA 31.01.01.075, Intermountain Gas Company ("Intermountain Gas" or "Company") submits this response to the City of Boise's Petition for Leave to Intervene ("Petition") in this proceeding.

In its Petition, the City of Boise states that it has a direct and substantial interest in this matter "as the entity tasked with administering the franchise agreement" with Intermountain Gas; because the City "is pursuing clean and renewable energy transition and energy use reduction goals;" and because Intermountain Gas's application "could affect environmental, health, and economic issues concerning Boise City and its citizens." Petition at 2-3.

Intermountain Gas recognizes that the City has an interest in this proceeding as a natural gas customer and as a governmental entity whose citizens are natural gas customers. Because the City has an interest in this proceeding, and because the Company welcomes dialogue with stakeholders regarding the subject matter of this application, Intermountain Gas does not object to the City's intervention.

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However, as the City recognizes, intervention is not permitted if it would unduly broaden the issues in a proceeding. Rule 37, IDAPA 31.01.01.073; Petition at 6. The Company respectfully submits that issues regarding the franchise agreement and the City's clean energy goals are not a part of this proceeding, and that the City's intervention (or Intermountain Gas's lack of objection to the City's intervention) should not be construed as permission to broaden the scope of this proceeding to encompass those issues.

Dated: March 16, 2020.

GIVENS PURSLEY LLP

By



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Preston N. Carter  
Attorney for Intermountain Gas Company

**CERTIFICATE OF SERVICE**

I certify that on March 16, 2020, a true and correct copy of the foregoing comments were served upon all parties of record in this proceeding via the manner indicated below:

**Commission Staff**

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