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IDAHO PUBLIC
UTILITIES COMMISSION

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Attorney for Boise City

**BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF INTERMOUNTAIN GAS
COMPANY'S APPLICATION 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

**CITY OF BOISE CITY'S
PETITION FOR LEAVE 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 – 31.01.0.73), and pursuant to that Application filed on January 27, 2020, and Notice of Application, Notice of Intervention Deadline and Notice of Suspension of Proposed Effective Date, Order No. 34560, filed on February 25, 2020, hereby petitions the Idaho Public Utilities Commission ("Commission") for leave to intervene herein and to appear and participate as a party, and as basis therefore 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 Abigail R. Germaine at:

Abigail R. Germaine
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
Idaho State Bar No. 9231
Email: agermaine@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 the entity tasked with administering the franchise agreement with Intermountain Gas Company for natural gas services within Boise City. In addition, Boise City is pursuing clean and renewable energy transition and energy use reduction goals which are a reflection of the comments and feedback received from the citizens of Boise City in the course of Boise City's various community

engagement processes. Intermountain Gas Company's Application could affect environmental, health, and economic issues concerning Boise City and its citizens.

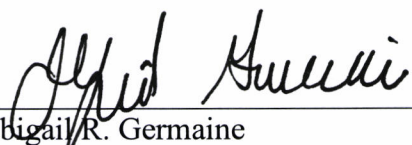
5. Without the opportunity to intervene herein, Boise City would be without any means of participation in this proceeding. If allowed to intervene, Boise City will provide written comments and otherwise fully participate in these proceedings as ordered by the Commission. In addition, should it be necessary, Boise City will appear in all matters as may be required and appropriate; present evidence; call and examine witnesses; and present argument.

6. Granting Boise City's petition to intervene will not unduly broaden the issues, nor will it prejudice any party to this case.

7. Boise City intends to fully participate in this matter as a party. 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. Boise City requests that the Commission issue a timely order granting or denying this Petition for Leave to Intervene following the seven-day opposition period set forth in IDAPA 31.01.01.075. Boise City also reserves its right to file for intervenor funding, depending upon the amount of time and resources involved in this matter pursuant to IDAPA 31-01.01.161-165.

WHEREFORE, the city of Boise City, respectfully requests that this Commission grant this Petition for Leave to Intervene.

DATED this 11 day of March 2020.



Abigail R. Germaine
Deputy City Attorney

CERTIFICATE OF SERVICE

I hereby certify that I have on this 11 day of March 2020, served the foregoing documents on all parties of counsel as follows:

Diane Hanian
Commission Secretary
Idaho Public Utilities Commission
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Suite 201-A
Boise, ID 83714
diane.holt@puc.idaho.gov

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- Personal Delivery
- Facsimile
- Electronic Means
- Other: _____

Matt Hunter
Deputy Attorney General
Idaho Public Utilities Commission
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- Facsimile
- Electronic Means
- Other: _____

Intermountain Gas Company
C/O Preston N. Carter
Givens Pursley LLP
pnc@givenspursley.com
kendrah@givenspursley.com

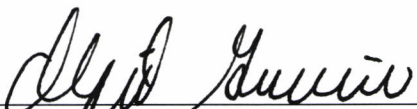
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Lori A. Blattner
Director – Regulatory Affairs
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Lori.Blattner@intergas.com

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Abigail R. Germaine
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