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IDAHO PUBLIC
UTILITIES COMMISSION

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Attorney for Intervenor

**BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF THE APPLICATION OF
INTERMOUNTAIN GAS COMPANY FOR A
DETERMINATION OF 2021 ENERGY
EFFICIENCY EXPENSES AS PRUDENTLY
INCURRED

Case No. INT-G-22-03

**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 – 31.01.01.73), the Application filed on July 12, 2022, and the Amended Notice of Application and Amended Notice of Intervention Deadline, Amended Order No. 35480, 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
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Boise, Idaho 83701-0500
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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, responses, 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 matter as representing the public interest of Intermountain Gas Company ("Intermountain Gas") customers that make up its constituency. Boise City is also a large commercial Intermountain Gas customer with a diversity of natural gas service accounts. As a customer with expressed clean energy preferences and community-wide energy efficiency targets, this proceeding directly impacts Boise City's ability to meet its energy use reduction goals. 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 18th day of August 2022.



Ed Jewell,
Deputy City Attorney

CERTIFICATE OF SERVICE

I hereby certify that I have on this 18th day of August 2022, served the foregoing documents on all parties of record as follows:

Jan Noriyuki
Commission Secretary
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Chris Burdin
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- Facsimile
- Electronic
- Other: _____

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Director – Regulatory Affairs
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Michelle Steel,
Paralegal