

JAYME B. SULLIVAN
BOISE CITY ATTORNEY

MARY R. GRANT (ISB No. 8744)
DARRELL EARLY (ISB No. 4748)
Deputy City Attorneys
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
mrgrant@cityofboise.org

Attorney for Boise City

**BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF CAPITOL WATER
CORPORATION'S APPLICATION TO
INCREASE ITS RATES AND CHARGES FOR
WATER SERVICE IN THE STATE OF IDAHO

Case No. CAP-W-24-01

**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 of Capitol Water Corporation to Increase its Rates and Charges for Water Service in the State of Idaho, filed on March 1, 2024; and Notice of Application, Notice of Intervention Deadline, Notice of Suspension of Proposed Effective Date, Order No. 36118, filed on March 22, 2024, hereby petitions the 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 Boise City 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 Mary R. Grant at:

Mary R. Grant
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. 8744
Email: boisecityattorney@cityofboise.org
mrgrant@cityofboise.org

Pursuant to Order No. 35569, 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 pleadings, 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 (TDAPA 31.0r.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 it represents the citizens of Boise City who are served by Capitol Water Corporation (the "Company") and Boise City is itself a customer of the Company. Boise City has nine (9) accounts and spends a range of \$3700 to \$4700 annually for potable water from the Company for Boise City facilities including the Library! at Ustick, Fire Department Station #4, Winstead Park, Milwaukee Park, and Spaulding Ranch.

The Company is proposing a twenty-four, point sixty-one, percent (24.61%) rate increase. This large rate increase will have a substantial effect on rate payers within the community.

5. Without the opportunity to intervene herein, Boise City would be without any means of participation in this proceeding which may have a material impact on the rates paid by Boise City citizens. If allowed to intervene, Boise City will participate in the proceedings and appear in all matters as may be necessary and appropriate; present evidence; call and examine witnesses; present argument; and otherwise fully participate in these proceedings.

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 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, Boise City, respectfully requests that this Commission grant this Petition for Leave to Intervene.

DATED this 12th day of April, 2024.



Mary R. Grant
Deputy City Attorney

CERTIFICATE OF SERVICE

I hereby certify that I have on this 12th day of April 2024, served the foregoing documents on all parties of counsel as follows:

Monica Barrios-Sanchez
Commission Secretary
Idaho Public Utilities Commission
11331 West Chinden Boulevard
Building 8, Suite 201-A
PO Box 83720
Boise, ID 83720
secretary@puc.idaho.gov

- U.S. Mail
- Personal Delivery
- Facsimile
- Electronic Means w/ Consent
- Other: _____

H. Robert Price
Capitol Water Corporation
2626 Eldorado
Boise, ID 83704
info@capitolwatercorp.com

- U.S. Mail
- Personal Delivery
- Facsimile
- Electronic Means w/ Consent
- Other: _____

Kathy Stockton
2310 W. Lemhi St.
Boise, ID 83705
kantwwkrev@gmail.com

- U.S. Mail
- Personal Delivery
- Facsimile
- Electronic Means w/ Consent
- Other: _____

Adam Triplett
Deputy Attorney General
Idaho Public Utilities Commission
11331 West Chinden Boulevard
Building 8, Suite 201-A
PO Box 83720
Boise, ID 83720
adam.triplett@puc.idaho.gov

- U.S. Mail
- Personal Delivery
- Facsimile
- Electronic Means w/ Consent
- Other: _____



Mary R. Grant
Deputy City Attorney