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Attorney for Intervenor

**BEFORE THE  
IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF THE APPLICATION OF  
VEOLIA WATER IDAHO INC. FOR  
AUTHORITY TO INCREASE ITS RATES AND  
CHARGES FOR WATER SERVICE IN THE  
STATE OF IDAHO

Case No. VEO-W-22-02

**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 Veolia Water Idaho Inc. Application for Authority to Increase its Rates and Charges for Water Service in the State of Idaho, and Notice of Application filed on September 30, 2022; and Notice of Application, Notice of Suspension of Proposed Effective Date, Notice of Intervention Deadline, Order No. 35569, filed on October 20, 2022, 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:

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IDAHO PUBLIC  
UTILITIES COMMISSION

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.  
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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 (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 it represents the citizens of Boise City who are served by Veolia Water Idaho Inc. (the "Company"), as well as being a customer of the Company itself. Boise City has three hundred twenty (320) municipal operations Veolia accounts and spends roughly five hundred thousand dollars (\$500,000.00) for potable water within Boise City municipal facilities annually. The Company is proposing a twenty-three, point

four, percent (23.4%) rate increase. This large rate increase will have a dramatic effect on rate payers all across 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 and Boise City itself. 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 10th day of November 2022.



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Mary R. Grant  
Deputy City Attorney



### CERTIFICATE OF SERVICE

I hereby certify that I have on this 10th day of November 2022, served the foregoing documents on all parties of counsel as follows:

Jan Noriyuki  
Commission Secretary  
Idaho Public Utilities Commission  
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Mary R. Grant, Deputy City Attorney