

JAYME B. SULLIVAN
BOISE CITY ATTORNEY

ABIGAIL R. GERMAINE (ISB No. 9231)
Deputy City Attorney
BOISE CITY ATTORNEY'S OFFICE
150 N. Capitol Blvd.
P.O. Box 500
Boise, ID 83701-0500
Telephone: (208) 384-3870
Facsimile: (208) 384-4454
Email: agermaine@cityofboise.org

Attorney for Boise City

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IDAHO PUBLIC
UTILITIES COMMISSION

**BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF IDAHO POWER
COMPANY'S APPLICATION FOR
AUTHORITY TO MODIFY SCHEDULE 84'S
METERING REQUIREMENT AND TO
GRANDFATHER EXISTING CUSTOMERS
WITH TWO METERS

Case No. IPC-E-20-26

**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 Idaho Power Company's Application for Authority to Modify Schedule 84's Metering Requirement and to Grandfather Existing Customers with Two Meters, and Notice of Application filed on June 19, 2020; and Notice of Intervention Deadline, Order No. 34728, filed on July 17, 2020, 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 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

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 maintains multiple solar panel installations and net metering facilities, such as those located at the Twenty Mile South Farm Administration and Maintenance Building. Boise City also has an interest in ensuring on-site solar generation program requirements are fair, just and equitable and encourage more municipal governments and citizens to install and use solar panels, thereby reducing pollution and achieving Boise City's energy goals. Boise City's broader clean energy goals 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. Boise City has an interest in the economic health of the area which in the future could be dependent on the ability to provide affordable renewable energy to existing and new companies who are setting 100% Renewable Energy goals. In addition, considering the abundant natural resources such as geothermal heat and solar access in Boise City, the renewable energy industry has the possibility of being a strong component of a diverse local economy. The outcome of this proceeding potentially affects environmental, health, and economic concerns of Boise City and its citizens.

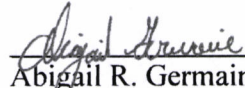
5. Without the opportunity to intervene herein, Boise City would be without any means of participation in this proceeding which may have a material impact on the net metering program and system payback analyses. If allowed to intervene, Boise City will participate in the proceedings and appear in all 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 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, Boise City, respectfully requests that this Commission grant this Petition for Leave to Intervene.

DATED this 7th day of August 2020.



Abigail R. Germaine
Deputy City Attorney

CERTIFICATE OF SERVICE

I hereby certify that I have on this 7th day of August 2020, served the foregoing documents on all parties of counsel as follows:

Jan Noriyuki
Commission Secretary
Idaho Public Utilities Commission
11331 West Chinden Boulevard
Building 8, Suite 201-A
PO Box 83720
Boise, ID 83720
jan.noriyuki@puc.idaho.gov

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

Lisa Nordstrom
Regulatory Dockets
Idaho Power Company
PO Box 70
Boise, ID 83707
lnordstrom@idahopower.com
dockets@idahopower.com

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

Connie Aschenbrenner
Timothy Tatum
Idaho Power Company
PO Box 70
Boise, ID 83707
caschenbrenner@idahopower.com
ttatum@idahopower.com

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

Edward Jewell
Deputy Attorney General
Idaho Public Utilities Commission
11331 West Chinden Boulevard
Building 8, Suite 201-A
PO Box 83720
Boise, ID 83720
edward.jewell@puc.idaho.gov

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

Eric L. Olsen
ECHO HAWK & OLSEN, PLLC
Attorneys at Law
505 Pershing Avenue Suite 100
PO Box 6119
Pocatello, ID 83205
elo@echohawk.com

*Attorneys for Idaho Irrigation Pumpers
Association, Inc.*

Anthony Yankel
12700 Lake Avenue, Unit 2505
Lakewood, OH 44107
tony@yankel.net

*for Idaho Irrigation Pumpers Association,
Inc.*

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

Kelsey Jae
Law for Conscious Leadership
920 North Clover Drive
Boise, ID 83703
kelsey@kelseyjaenunez.com
Attorneys for Idaho Sierra Club

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

Lisa Young
Mike Heckler
503 West Franklin Street
Boise, ID 83702
Lisa.young@sierraclub.org
Michael.p.heckler@gmail.com
For Idaho Sierra Club

- ☐ U.S. Mail
- ☐ Personal Delivery
- ☐ Facsimile
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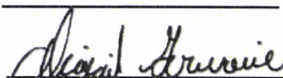
Benjamin J. Otto
Idaho Conservation League
710 North 6th Street
Boise, ID 83702
botto@idahoconservation.org

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

Russell Schiermeier
29393 Davis Road
Bruneau, ID 83604
buyhay@gmail.com

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

- ☐ U.S. Mail
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Abigail R. Germaine
Deputy City Attorney