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Jim Kreider  
STOP B2H Coalition  
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January 11, 2023

To: Filing Center and Service list of PCN 5

Re: Reply to Motion for proper notification of all persons who have interests, known or of record, in the land to be physically impacted or traversed by the proposed route OAR 860-025-0030(2)(f) per ALJ Mellgren's December 19, 2022 memorandum in PCN 5

Please accept and post the following reply to the other parties' response to the original motion.

Submitted by



Jim Kreider  
Co-Chair, STOP B2H Coalition | <http://stopb2h.org/>  
541.406.0936 (c) | 541-406-0727 (o)  
[jkreider@campblackdog.org](mailto:jkreider@campblackdog.org) | [jim@stopb2h.org](mailto:jim@stopb2h.org)

PS: Motion rejected because forgot to sign the actual motion so resending. Thought signing the cover letter as a part of the pdf send would suffice. Will strive to eliminate cover letter and only sign documents in the future.

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

Docket No. PCN 5

In the Matter of  IDAHO POWER COMPANY CERTIFICATION OF PUBLIC CONVENIENCE AND NECESSITY	STOP B2H Coalition  Motion for proper notification of all persons who have interests, known or of record, in the land to be physically impacted or traversed by the proposed route OAR 860-025-0030(2)(f)
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STOP B2H Coalition stands on its December 29, 2022 Motion.

OAR 860-025-0030(2)(f) reads:

A description of the parcels of land that petitioner determines it should obtain an interest in and for which condemnation is assumed to be necessary at the time of the petition, a full explanation of the intended use, and the specific necessity and convenience of each. The description must be accompanied by the names and addresses of all persons who have interests, known or of record, in the land to be physically impacted or traversed by the proposed route from whom petitioner has not yet acquired the interest, rights of way or option therefor. Petitioner must include with the petition certification verifying that notice of the petition has been mailed to said persons;

As documented, Idaho Power mailed two letters to persons who have interests, known or of record, in the land to be physically impacted or traversed by the proposed route from whom petitioner has not yet acquired the interest, rights of way or option therefor.

The two letters were mailed weeks before the scheduled procedural conference to establish the procedural schedule. The company's proposed schedule was a desire not a fact and open to modification. In fact the schedule had a very aggressive timeframe. It is common knowledge--except to impacted landowners and the public-- that the probability of a schedule adjustment in a scheduling conference proceeding was highly probable.

These mailings misinformed those it was to inform. Therefore, STOP stands on its December 29, 2022 Motion.

Submitted by



Jim Kreider  
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DOCKET PCN 5 - CERTIFICATE OF SERVICE

I hereby certify that on January 11, 2023 the STOP B2H Coalition sent a copy of:

Reply to Motion for proper notification of all persons who have interests, known or of record, in the land to be physically impacted or traversed by the proposed route OAR 860-025-0030(2)(f) per ALJ Mellgren's December 19, 2022 memorandum in PCN 5

was served by USPS First Class Mail to said person(s) at his or her last-known address(es) as indicated below:

By: USPS First Class Mail:

John C. Williams  
PO Box 1384  
La Grande, OR 97850  
DATED: January 11, 2023

Submitted by



Jim Kreider  
Co-Chair, STOP B2H Coalition |  
<http://stopb2h.org/>  
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