

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

**IN THE MATTER OF IDAHO
POWER COMPANY'S**

**PETITION FOR CERTIFICATE OF
PUBLIC CONVENIENCE AND
NECESSITY**

Docket: PCN 5

**Motion to Admit Testimony and
Exhibits and Declaration**

Intervenor: John C. Williams

Date: April 25, 2023

John C. Williams, Intervenor

P.O. Box 1384

La Grande, Oregon 97850

I, John C. Williams, Intervenor, move to admit the following testimony and exhibits into the record for the OPUC Contested Case PCN-5.

Marking Code	Date Filed in Docket	Name of Docket Entry	Original Citation	Protected Order?
John C. Williams/100	2/1/2023	Amended Opening Testimony	n/a	No
John C. Williams/101/ CV-Steinmetz	2/1/2023	Amended Opening Testimony, Exhibit 1 CV of Witness Shawn Steinmetz	n/a	No
John C. Williams/101.a./ Testimony-Steinmetz	2/1/2023	Amended Opening Testimony, Exhibit 1a Expert Testimony Witness Shawn Steinmetz	n/a	No
John C. Williams/102	2/1/2023	Amended Opening Testimony, Exhibit 2 Links to Briefs in Supreme Court Case	Citation Next row	No
<p>Links to Supreme Court Appeal of the EFSC Site Certificate (Filed in PCN5: 12/21/2022): Opening Brief, McAllister Amicus Brief, Morrison https://edocs.puc.state.or.us/efdocs/HAH/pcn5hah81518.pdf</p>				
John C. Williams/103	2/1/2023	Amended Opening Testimony, Exhibit 3 Link to BLM Record of Decision	Citation Next row	No
<p>Original Citation: https://eplanning.blm.gov/eplanningui/project/68150/570 BLM Record of Decision 11/17/2017 Appendix E. Programmatic Agreement, dated September 30, 2016 and Appendices: Boardman to Hemingway Archaeological Survey Plan, Prepared by Tetra Tech, January 2013. Boardman to Hemingway Visual Assessment of Historic Properties Study Plan, Prepared by Tetra Tech, dated January 2013.</p>				
John C. Williams/104	2/1/2023	Two Maps: John C. Williams property 1) Displaying new/proposed access roads (in white) 2) Displaying location of new and additional towers proposed due to	n/a	No

		EFSC mitigation for Morgan Lake route and new corresponding access roads. From “Memorandum of Easement Option Agreement Packet”		
Idaho Power/700/Kirk Ranzetta	2/21/2023	Reply Testimony of Kirk Ranzetta	n/a	No
Idaho Power/800/Stephen Anderson	2/21/2023	Stephen Anderson Reply Testimony	n/a	No
Idaho Power/1500/Joseph Stippel	2/21/2023	Reply Testimony/pp 6-8 - Supplemental to Petition for CPCN	n/a	No
John C. Williams/200	3/20/2023	John C. Williams Rebuttal Testimony	n/a	No
Williams, John/201 Exhibit 1/201 ¹	3/20/2023	John C. Williams Rebuttal Testimony Exhibit 1/201	Citation Next row	No
NPS. 1997. How to Apply the National Register Criteria for Evaluation. National Register Bulletin 15. U.S. Department of the Interior, National Park Service, Washington, D.C.				
Williams, John/200 Exhibit 2/202 ²	3/20/2023	John C. Williams Rebuttal Testimony Exhibit 2/202	Citation Next row	No
NPS. 2000. <i>Guidelines for Evaluating and Registering Archeological Properties</i> . National Register Bulletin 36. Available online at: http://www.nps.gov/nr/publications/index.htm				
Williams, John/200 Exhibit 3/203	3/20/2023	John C. Williams Rebuttal Testimony Exhibit 3/203	Citation Next row	No

¹ This was originally mislabeled on 4/12/2023 (cross exam lists) as: Williams, John/200 *Exhibit 2/201*. It should have been marked as **Exhibit 1/201**. [emphasis added]

² This was originally mislabeled on 4/12/2023 (cross exam lists) as: Williams, John/200 *Exhibit 3/202*. It should have been marked as **Exhibit 2/202**. [emphasis added]

36 CFR PART 800 -- PROTECTION OF HISTORIC PROPERTIES (incorporating amendments effective August 5, 2004) https://www.achp.gov/sites/default/files/regulations/2017-02/regs-rev04.pdf				
Staff /400/Pal, Staff /400/Pal/401, Staff /400/Pal /403	3/20/2023	Rebuttal Testimony and Exhibits of Staff, Pal	n/a	No
Staff /500/Rashid	3/20/2023	Rebuttal Testimony of Staff, Rashid	n/a	No
Staff/600/Lockwood	3/20/2023	Rebuttal Testimony of Staff, Lockwood	n/a	No
Idaho Power/2100/Kirk Ranzetta	4/7/2023	Kirk Ranzetta Surrebuttal Testimony	n/a	No
Idaho Power/2200/Stephen Anderson	4/7/2023	Stephen Anderson Surrebuttal Testimony	n/a	No
Williams/301/Cross/Maps	4/12/2023	John C. Williams, Exhibit 1 for Cross Exam: Three Images of maps of the Flow Routing - Emergency Action Plan and Bypass Conceptual Layout	n/a	No
Williams/302/Cross	4/12/2023	John C. Williams, Exhibit 2 for Cross Exam	Citation Next row	No
NPS (National Park Service). 1983. Standards for Archaeology and Historic Preservation. U.S. Department of the Interior, NPS, Washington, D.C				
Williams/303/Cross	4/12/2023	John C. Williams, Exhibit 3 for Cross Exam	Citation Next row	No
NPS. 1985. Guidelines for Local Surveys: A Basis for Preservation Planning. National Register Bulletin. U.S. Department of the Interior, National Park Service, Washington, D.C.				
Williams/304/Cross	4/12/2023	John C. Williams, Exhibit 4 for Cross Exam	Citation Next row	No
NPS. 1997. How to Complete the National Register Registration Form. U.S. Department of the Interior, National Park Service, Washington, D.C.				
Williams/305/Cross	4/12/2023	John C. Williams, Exhibit 5 for Cross Exam	Citation Next row	No

NPS. 1999. Guidelines for Evaluating and Documenting Rural Historic Landscapes. U.S. Department of the Interior National Park Service, Washington, D.C.				
Williams/306/Cross/pages 1-3	4/12/2023	John C. Williams, Exhibit 6 for Cross Exam	Citation Next row	No
ACHP Memorandum, Re: Recent court decision regarding the meaning of “direct” in Sections 106 and 110(f) of the National Historic Preservation Act https://shpo.nv.gov/uploads/documents/OGC_memo_to_ACHP_staff_re_meaning_of_direct_67-19.pdf				
Williams/307/Cross/pages 2-3	4/12/2023	John C. Williams, Exhibit 7 for Cross Exam: Settlement Agreement, IPC and John C. Williams, March 25, 2022	n/a	No
Williams/308/Cross	4/12/2023	DR#1 Response and two attachments (maps-same as Exhibit 104) plus, a Confidential map not included herein.	n/a	No

Per OAR 860-001-0460, I would like the Commission to take **official notice** of the following evidence which was admitted in the EFSC Contested Case (with links):

Williams/300	4/12/2023	Cultural Resources Exhibit S in Application for Site Certificate (ASC) - ODOE/EFSC, including Attachment S-9: HPMP (2018)	Citation Next row	No
ODOE - B2HAPPDoc3-36 ASC 19_Exhibit S_Cultural_ASC_Public 2018-09-28. https://www.oregon.gov/energy/facilities-safety/facilities/Facilities%20library/2018-09-28B2H-ASC-Exhibit-S.pdf Exhibit S-9: “HISTORIC PROPERTIES MANAGEMENT PLAN (WITH INADVERTENT DISCOVERY PLAN)” - BOARDMAN TO HEMINGWAY TRANSMISSION LINE PROJECT HISTORIC PROPERTIES MANAGEMENT PLAN FOR OREGON DEPARTMENT OF ENERGY COMPLIANCE SHPO Case #: 08-2232.				
Williams/300	4/12/2023	John Williams Direct Testimony in EFSC Contested Case (2019-ABC-02833). Filed on 9/16/2021.	Citation Next row	No
Direct Testimony John C. Williams HCA-7, 9/16/2021 (EFSC case 2019-ABC-02833, no bate stamp; 2. In One Drive) https://oregonenergy-				

my.sharepoint.com/personal/askenergy_odoe_state_or_us/Documents/B2H/Select%20Contested%20Case%20Files/05%20Contested%20Case%20Issues/27-HCA%207%20Arch%20Resource%20on%20Williams%20Property/2%20Direct%20Testimony/HCA-7%20Written%20Direct%20Testimony%20Williams%202021-09-17.pdf?CT=1681283841400&OR=ItemsView				
Williams/300	4/12/2023	John C. Williams 1st Amended Surrebuttal Testimony in EFSC Contested Case (2019-ABC-02833). Filed on 12/2/2021.	Citation Next row	No
Surrebuttal John C. Williams HCA-7, 1st Amended 12/2/2021 (EFSC case 2019-ABC-02833, no bate stamp; 4. In One Drive) https://oregonenergymy.sharepoint.com/personal/askenergy_odoe_state_or_us/layouts/15/onedrive.aspx?ga=1&id=%2Fpersonal%2Faskenergy%5Fodoe%5Fstate%5Ffor%5Fus%2FDocuments%2FB2H%2FSelect%20Contested%20Case%20Files%2F05%20Contested%20Case%20Issues%2F27%2DHCA%207%20Arch%20Resource%20on%20Williams%20Property%2F4%20Williams%20Sur%2Drebuttal				
Williams/300	4/12/2023	John C. Williams Response Testimony to IPC's Objections to Sur-rebuttal Testimony and Exhibits in EFSC Contested Case (2019-ABC-02833). Filed on 12/31/2021.	Citation Next row	No
RESPONSE OF JOHN C. WILLIAMS TO IDAHO POWER COMPANY'S OBJECTIONS TO LIMITED PARTIES' SUR-REBUTTAL TESTIMONY AND EXHIBITS, 12/31/2021 (EFSC case 2019-ABC-02833, no bate stamp; 5.b. in One Drive) https://oregonenergymy.sharepoint.com/:w:/r/personal/askenergy_odoe_state_or_us/layouts/15/Doc.aspx?source=doc=%7B5B3C2768-395D-4D42-8022-D22CDB8BE25E%7D&file=Williams%2C%20John%20IPC%20objection%20%232%2012-31-21.docx&action=default&mobileredirect=true				
Williams/300	4/12/2023	John C. Williams Closing Argument in EFSC Contested Case (2019-ABC-02833). Filed on 12/28/2022.	Citation Next row	No
CLOSING ARGUMENT of John C. Williams, OAH Case No. 2019-ABC-02833, Issue HCA-7, 12/28/2022. (EFSC case 2019-ABC-02833, no bate stamp; 6.b. in One Drive) https://oregonenergymy.sharepoint.com/personal/askenergy_odoe_state_or_us/layouts/15/onedrive.aspx?ga=1&id=				

d=%2Fpersonal%2Faskenergy%5Fodoe%5Fstate%5For%5Fus%2FDocuments%2FB2H%2FSelect%20Contested%20Case%20Files%2F05%20Contested%20Case%20Issues%2F27%2DHCA%207%20Arch%20Resource%20on%20Williams%20Property%2F6b%20Closing%20Williams%2FWilliams%20John%20Closing%20Argument%202%2D28%2D22%2Epdf&parent=%2Fpersonal%2Faskenergy%5Fodoe%5Fstate%5For%5Fus%2FDocuments%2FB2H%2FSelect%20Contested%20Case%20Files%2F05%20Contested%20Case%20Issues%2F27%2DHCA%207%20Arch%20Resource%20on%20Williams%20Property%2F6b%20Closing%20Williams				
Williams/300	4/12/2023	John C. Williams Response Brief in EFSC Contested Case (2019-ABC-02833). Filed on 3/30/2022.	Citation Next row	No
RESPONSE BRIEF OF JOHN C. WILLIAMS, OAH Case No. 2019-ABC-02833, Issue HCA-7. 3/30/2022. (EFSC case 2019-ABC-02833, no bate stamp; 7.b. in One Drive) https://oregonenergymy.sharepoint.com/:w:/r/personal/askenergy_odoe_state_or_us/_layouts/15/Doc.aspx?source doc=%7B92EF24CC-9203-4105-A14A-95CF6C5C4716%7D&file=Williams%2C%20John%20Response%20Brief%203-29-22.docx&action=default&mobileredirect=true				
Finally, I would also like to include in this Motion to Admit, the Official Transcript of the Evidentiary Hearing , which has not yet been published.				

I hereby declare under penalty of perjury under the laws of the State of Oregon that I prepared the testimony and exhibits in this proceeding, listed and cited above, and that to the best of my knowledge and belief, declare the statements, testimony and exhibits to be true and that they were made for use by the Commission as evidence in this proceeding.

Dated this twenty fifth (25) day of April, 2023.

/s/ John C. Williams

John C. Williams