

JOHN R. KROGER  
Attorney General



MARY H. WILLIAMS  
Deputy Attorney General

DEPARTMENT OF JUSTICE  
GENERAL COUNSEL DIVISION

February 26, 2009

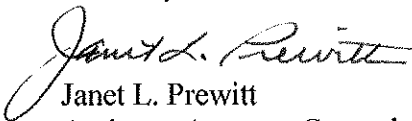
Filing Center  
Public Utility Commission of Oregon  
550 Capitol St. NE – Suite 215  
PO Box 2148  
Salem, OR 97308-2148

Re: *In the Matter of IDAHO POWER COMPANY Application for Adoption of its 2006  
Integrated Resource Plan*  
PUC Docket No.: LC 41  
DOJ File No.: 330-050-GN0967-06

Dear Filing Center:

Enclosed are the Oregon Department of Energy's Motion to Intervene Out of Time and  
Petition to Intervene for filing with the PUC today.

Sincerely,

  
Janet L. Prewitt  
Assistant Attorney General  
Natural Resources Section

Enclosures  
JLP:mme/#1305420  
cc: LC 41 Service List  
Adam Bless  
Vijay Satyal

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

LC 41

In the Matter of IDAHO POWER )  
COMPANY Application for Adoption of ) PETITION TO INTERVENE  
its 2006 Integrated Resource Plan )  
)

NAME OF PETITIONER: Oregon Department of Energy

ADDRESS: 625 Marion Street N.E., Salem, OR 97301-3737

PHONE NUMBER: (503) 378-4040

FAX NUMBER: (503) 373-7806

E-MAIL ADDRESSES: adam.bless@state.or.us  
vijay.satyal@state.or.us

NAME OF COUNSEL FOR PETITIONER: Janet L. Prewitt, Senior Assistant Attorney General

COUNSEL'S ADDRESS: Department of Justice, Natural Resources Section 1162 Court Street  
N.E., Salem, OR 97301-4096

COUNSEL'S PHONE NUMBER: (503) 947-4500

COUNSEL'S FAX NUMBER: (503) 378-3802

COUNSEL'S E-MAIL ADDRESS: janet.prewitt@doj.state.or.us

PLEASE SEND COPIES TO: Adam Bless, Oregon Department of Energy, 625 Marion Street  
N.E., Salem, OR 97301-3737. Vijay Satyal, Oregon Department of Energy, 625 Marion Street  
N.E., Salem, OR 97301-3737.

IF THE PETITIONER IS AN ORGANIZATION, THE NUMBER OF MEMBERS IN AND  
THE PURPOSES OF THE ORGANIZATION: Not applicable.

NATURE AND EXTENT OF THE PETITIONER'S INTEREST IN THE PROCEEDING:

Under ORS 469.030, the Oregon Department of Energy (“ODOE”) is statutorily charged with the responsibility to study, evaluate and disseminate information about energy use in Oregon. ODOE’s responsibilities include the preparation of a comprehensive energy plan under ORS 460.060 and an energy forecast under ORS 469.070. As part of these responsibilities, under ORS 469.060 ODOE is charged with making “recommendations for state and local governments to assist in the development and maximum use of cost-effective conservation and renewable resources, consistent with the energy policy stated in ORS 469.010 \* \* \*.” (ORS 469.060(3)(f)). In aid of that responsibility, ODOE “may intervene in any proceeding undertaken by an agency for the purpose of expressing its views as to the effect of an agency action, upon state energy resources and state energy policy.” ORS 469.110(2).

In addition, on February 5, 2009 Idaho Power Company filed a Supplemental Action in this matter requesting to include the Boardman to Hemmingway Transmission Line in its integrated resource plan. The Department of Energy acts as staff to the Energy Facility Siting Council and will participate in this proceeding pursuant to its responsibility under ORS 469.040(1)(b) to facilitate the work of the Council.

THE ISSUES THE PETITIONER INTENDS TO RAISE AT THE PROCEEDING:

Unknown at this time.

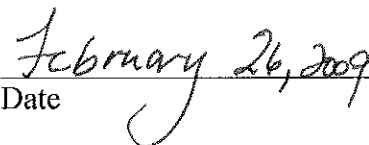
ANY SPECIAL KNOWLEDGE OR EXPERTISE OF THE PETITIONER THAT WOULD ASSIST THE COMMISSION IN RESOLVING THE ISSUES IN THE PROCEEDING:

See description of the ODOE’s interest, above.

Based on the information provided above in accordance with the Commission’s rules of procedure, I request to participate in this proceeding as an intervenor. I, or the organization that I represent, will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding. OAR 860-013-0021.

Pursuant to OAR 860-013-0070(4), Petitioner hereby agrees to accept serve by electronic mail and waives other forms of service provided in OAR 860-013-0073.

  
\_\_\_\_\_  
Petitioner or Petitioner’s Representative

  
\_\_\_\_\_  
Date

SERVICE LIST LC 41

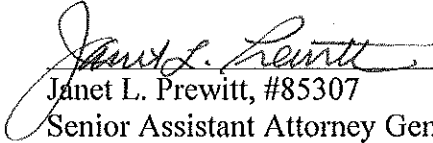
<p>Christa Bearry          Idaho Power Company          P.O. Box 70          Boise, ID 83707-0070  <a href="mailto:cbearry@idahopower.com">cbearry@idahopower.com</a></p>	<p>Karl Bokenkamp          General Manager-Power Supply Planning          Idaho Power Company          P.O. Box 70          Boise, ID 83707-0070  <a href="mailto:kbokenkamp@idahopower.com">kbokenkamp@idahopower.com</a></p>
<p>Maggie Brilz          Pricing and Regulatory Services          Idaho Power Company          P.O. Box 70          Boise, ID 83707-0070  <a href="mailto:mbrilz@idahopower.com">mbrilz@idahopower.com</a></p>	<p>Lowrey R. Brown          Utility Analyst          Citizens' Utility Board of Oregon          610 SW Broadway – Ste. 308          Portland, OR 97205  <a href="mailto:lowrey@oregoncub.org">lowrey@oregoncub.org</a></p>
<p>Jason Eisdorfer          Energy Program Director          Citizens' Utility Board of Oregon          610 SW Broadway Ste. 308          Portland, OR 97205  <a href="mailto:dockets@oregoncub.org">dockets@oregoncub.org</a></p>	<p>Ric Gale          VP – Regulatory Affairs          Idaho Power Company          P.O. Box 70          Boise, ID 83707  <a href="mailto:rgale@idahopower.com">rgale@idahopower.com</a></p>
<p>Robert Jenks          Citizens' Utility Board of Oregon          610 S.W. Broadway, Suite 308          Portland, OR 97205  <a href="mailto:bob@oregoncub.org">bob@oregoncub.org</a></p>	<p>Barton L. Kline          Senior Attorney          Idaho Power Company          P.O. Box 70          Boise, ID 83707-0070  <a href="mailto:bkline@idahopower.com">bkline@idahopower.com</a></p>
<p>Wendy McIndoo          Office Manager          McDowell &amp; Rackner PC          520 S.W. 6<sup>th</sup> Avenue, Suite 830          Portland, OR 97204  <a href="mailto:wendy@mcd-law.com">wendy@mcd-law.com</a></p>	<p>Monica B. Moen          Attorney          Idaho Power Company          P.O. Box 70          Boise, ID 83707-0070</p>

<p>Lisa D. Nordstrom  Attorney  Idaho Power Company  P.O. Box 70  Boise, ID 83707-0070  <a href="mailto:lnordstrom@idahopower.com">lnordstrom@idahopower.com</a></p>	<p>Lisa F. Rackner  Attorney at Law  McDowell &amp; Rackner PC  520 S.W. 6<sup>th</sup> Avenue, Suite 830  Portland, OR 97204  <a href="mailto:lisa@mcd-law.com">lisa@mcd-law.com</a></p>
<p>Gregory W. Said  Director – Revenue Requirement  Idaho Power Company  P.O. Box 70  Boise, ID 83707-0070  <a href="mailto:gsaid@idahopower.com">gsaid@idahopower.com</a></p>	<p>Mark Stokes  Manager, Power Supply &amp; Planning  Idaho Power Company  P.O. Box 70  Boise, ID 83707-0070  <a href="mailto:mstokes@idahopower.com">mstokes@idahopower.com</a></p>
<p>Stop Idaho Power  3535 Butte Drive  Ontario, OR 97914</p>	<p>Michael Youngblood  Senior Pricing Analyst  Idaho Power Company  P.O. Box 70  Boise, ID 83707-0070  <a href="mailto:myoungblood@idahopower.com">myoungblood@idahopower.com</a></p>

CERTIFICATE OF SERVICE

I hereby certify that on the 26th day of February 2009, I served the foregoing MOTION TO INTERVENE OUT OF TIME and PETITION TO INTERVENE upon the persons named on the service list, by mailing a full, true and correct copy thereof to such persons waiving such service by mail who were served at their e-mail address as listed on the service list.

DATED: February 26, 2009

  
Janet L. Prewitt, #85307  
Senior Assistant Attorney General