

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

LC 53

**Idaho Power Company**

**PETITION TO INTERVENE**

NAME OF PETITIONER: Stop Idaho Power

ADDRESS: 3535 Butte Drive, Ontario, OR 97914

PHONE NUMBER: 541.889.5908

E-MAIL ADDRESS: rogerfindley@q.com

NAME OF COUNSEL FOR PETITIONER: Thomas H. Nelson

COUNSEL'S ADDRESS: PO Box 1211, Welches, OR 97067

COUNSEL'S PHONE NUMBERS: 503.442.9157; 503.709.6397

COUNSEL'S E-MAIL ADDRESS: nelson@thnelson.com

IF THE PETITIONER IS AN ORGANIZATION, THE NUMBER OF MEMBERS IN  
AND THE PURPOSES OF THE ORGANIZATION:

Approximately 300 members, growing steadily; purpose is to assure that the route of the proposed Boardman-Hemingway 500-kV transmission line not be over any portion of the EFU lands in Malheur County or, lacking that, preventing the construction of the line.

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

Petitioner requests full party status in order to address all aspects of Idaho Power Company's application.

THE ISSUES THE PETITIONER INTENDS TO RAISE AT THE PROCEEDING:

Whether the Commission has jurisdiction to entertain the application; whether the Commission should dismiss the application on prudential grounds; whether the line is needed; whether the construction of the line is economically feasible, and other issues that may arise during the hearings.

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

Knowledge of local circumstances and limitations in Malheur County along the proposed route of the line.

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. Neither I nor the organization that I represent will 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 service by electronic mail and waives other forms of service provided in OAR 860-013-0073.

Petitioner waives paper service but requests that electronic copies be emailed to the undersigned and to Petitioner, rogerfindley@q.com.

DATED: July 27, 2011



Thomas H. Nelson, OSB 78315  
Petitioner's Representative  
PO Box 1211  
Welches, OR 07067  
[nelson@thnelson.com](mailto:nelson@thnelson.com)

CERTIFICATE OF SERVICE

I hereby certify that, on July 27, 2011, I served a true and correct copy of Stop Idaho Power's Petition to Intervene in Docket LC53, on the Idaho Power Company representatives listed below.

<b>W</b>	<b>IDAHO POWER COMPANY</b>	
	CHRISTA BEARRY	PO BOX 70 BOISE ID 83707-0070 cbearry@idahopower.com
	MARK STOKES MANAGER, POWER SUPPLY & PLANNING	PO BOX 70 BOISE ID 83707 mstokes@idahopower.com
<b>W</b>	<b>MCDOWELL &amp; RACKNER PC</b>	
	WENDY MCINDOO OFFICE MANAGER	520 SW 6TH AVE STE 830 PORTLAND OR 97204 wendy@mcd-law.com
	LISA F RACKNER ATTORNEY	520 SW SIXTH AVENUE STE 830 PORTLAND OR 97204 lisa@mcd-law.com

---



Thomas H. Nelson  
Attorney for Stop Idaho Power