



April 2, 2009

**Fred Warner Jr.**

Commission Chair  
fwarner@bakercounty.org

Oregon Public Utility Commission  
Attention: Filing Center  
PO Box 2148  
Salem, OR 97308-2148

**Tim L. Kerns**

Commissioner  
tkerns@bakercounty.org

Re: In the matter of Idaho Power Company 2009 Addendum to their 2006  
Integrated Resource Plan, OPUC Docket No. LC 41

Attention Filing Center:

**Carl E. Stiff, M.D.**

Commissioner  
cestiff@bakercounty.org

Enclosed is Baker County's Motion to Intervene for filing with the PUC today.

Sincerely,

Fred Warner, Jr.  
Baker County Commission Chair

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON  
LC 41**

In the matter of IDAHO POWER	)	PETITION TO INTERVENE
COMPANY Application for Adoption of	)	OF BAKER COUNTY,
Its 2006 Integrated Resource Plan	)	OREGON

NAME OF PETITIONER: Baker County, Oregon

ADDRESS: 1995 Third Street, Baker City, OR 97814

PHONE NUMBER: (541) 523-8200

FAX NUMBER: (541) 523-8201

E-MAIL ADDRESS: fwarner@bakercounty.org

NAME OF CONTACT FOR PETITIONER: Heidi Martin

CONTACT'S ADDRESS: 1995 Third Street, Baker City, OR 97814

CONTACT'S PHONE NUMBER: (541) 523-8200

CONTACT'S FAX NUMBER: (541) 523-8201

CONTACT'S E-MAIL ADDRESS: hmartin@bakercounty.org

PLEASE SEND COPIES TO: Baker County Commissioners 1995 Third Street, Baker City, OR 97814

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

NATURE AND EXTENT OF THE PETITIONER'S INTEREST IN THE PROCEEDING: On February 5, 2009, Idaho Power filed a Supplemental Action in this docket requesting inclusion of the Boardman-Hemingway transmission line in its Integrated Resource Plan. Part of this transmission line will be located in Baker County, Oregon. Baker County requests full party status in order to monitor and challenge, if necessary, assumptions made by Idaho Power such as whether the line is needed, clients served, customer load projections and other issues that may arise during the hearings.

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 Baker County's interest above. In addition, the elected officials and governing body of Baker County have particular knowledge of the County's local economic and social structure and the resources and limitations of its land.

Based on the information provided above in accordance with the Commission's rules or procedure, Baker County requests to participate in this proceeding as an intervenor. Such intervention will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding. OAR 860-012-0001(2). I am authorized to represent Baker County, and my representation will not unreasonably broaden the issues, delay the proceeding, or otherwise hinder the orderly and timely development of the record. OAR 860-012-0001(2).

The undersigned hereby consents to receipt of all materials related to this docket by electronic transmission to the e-mail address specified above and waives other forms of service provided in OAR 860-013-0070(1).

DATED: April 2, 2009

A handwritten signature in blue ink that reads "Fred Warner Jr." with a stylized flourish at the end.

Fred Warner Jr.  
Baker County Commission Chair

**CERTIFICATE OF SERVICE**

I hereby certify that on the 2<sup>nd</sup> day of April, 2009, I have served the foregoing Petition to Intervene upon the persons named on the official service list, shown below, by mailing a complete copy thereof via first class mail, unless the party waived paper service, in which case I served an electronic copy via electronic mail.

**BONNEVILLE POWER  
ADMINISTRATION**

905 NE 11<sup>TH</sup> Ave  
Portland OR 97232  
chcombs@bpa.gov

**STOP IDAHO POWER**

3535 BUTTE DRIVE  
ONTARIO OR 97914  
nelson@thnelson.com

**CITIZEN'S UTILITY BOARD  
OF OREGON**

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**DEPARTMENT OF JUSTICE**

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**IDAHO POWER COMPANY**

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**OREGON DEPARTMENT OF  
ENERGY**

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Dated this 2<sup>nd</sup> day of April, 2009.

A handwritten signature in blue ink that reads "Fred Warner, Jr." in a cursive script.

Fred Warner, Jr.  
Baker County Commission