Lawyers

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April 2, 2009

Oregon Public Utility Commission Attention: Filing Center P. O. Box 2148 Salem, OR 97308-2148

Re: In the Matter of Idaho Power Company

2009 Addendum to their 2006 Integrated Resource Plan,

OPUC Docket No. LC 41

Attention Filing Center:

Enclosed for filing in this docket is Petition to Intervene of Halt Idaho Power. Please date stamp the enclosed copy of this letter and return it in the envelope provided.

This document is being served upon the LC 41 service list. Thank you.

Sincerely,

Milo Pope

enc

LC 41 Service List

John Milbert Maruizio Valerio

BEFORE THE PUBLIC UTILITIES COMMISSION

OR OREGON

LC 41

In the Matter of

IDAHO POWER COMPANY

Application for Acknowledgement of February 2009 Addendum to its 2006 Integrated Resource Plan.

PETITION TO INTERVENE of HALT IDAHO POWER,

WAIVER OF PAPER SERVICE

NAME OF PETITIONER:

Halt Idaho Power

ADDRESS:

c/o John B. Milbert

1812 Jefferson Avenue, La Grande OR 97850

PHONE NUMBER:

541.963.6964

FAX NUMBER:

none

E-MAIL ADDRESS:

flagstaff@verizon.net

NAME OF COUNSEL FOR PETITIONER:

Milo Pope, Yervasi Pope, PC

COUNSEL'S ADDRESS:

P. O. Box 50, Baker City, OR 97814

COUNSEL'S PHONE NUMBER:

541.523.7973

COUNSEL'S FAX NUMBER:

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COUNSEL'S E-MAIL ADDRESSES:

milo@thegeo.net

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

Petitioner's membership is unknown because the organization was recently formed. Petitioner's purpose is to secure the rerouting of the proposed Boardman-Hemingway transmission from EFU land in Union County or, lacking that, preventing the construction of the line in Union County.

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NATURE AND EXTENT OF 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:

- 1. The need for the transmission line and the validity of Idaho power company's demand projections.
- 2. Availability of alternative transmission resources from other utilities.
- 3. The effect on the project of a change in the location or failure to construct the Boardman terminus.
- 4. Whether the Commission should consider the transmission line project in conjunction with more recent data to be submitted by Idaho Power Company in its 2009 Integrated Resource Plan.

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

Knowledge of local circumstances, the impact on our county and communities.

Based upon 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 860-012-0001.

Petitioner hereby consents to receipt of all materials related to this docket by electronic transmission to flagstaff@verizon.net.

DATED:

April 2, 2009.

Milo Pope

Petitioner's Representative

P. O. Box 50

Baker City, OR 97814-0050

milo@thegeo.net

CERTIFICATE OF SERVICE

Docket No. LC 41

I certify that on April 2, 2009, I served the foregoing Petition to Intervene of Halt Idaho Power by electronic mail to those parties whose email addresses appear on the attached service list, and by First Class US Mail, postage prepaid and properly addressed, to those parties on the attached service list who have not waived paper service in this case.

DATED: April 2, 2009.

Milo Pope, OSB #67102

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