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April 1, 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 Move 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,

A handwritten signature in black ink, appearing to read 'Milo Pope', written in a cursive style.

Milo Pope

enc

c LC 41 Service List

**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 MOVE IDAHO POWER,  
WAIVER OF PAPER SERVICE

**NAME OF PETITIONER:** Move Idaho Power  
**ADDRESS:** 42659 Sunnyslope Rd, Baker City, OR 97814  
**PHONE NUMBER:** 541.523.3015  
**FAX NUMBER:** none  
**E-MAIL ADDRESS:** nancypeyron@msn.com

**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:** 541.523.7993  
**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 has approximately 100 members and is growing steadily. Petitioner's purpose is to secure the rerouting of the proposed Boardman-Hemingway transmission from EFU land in Baker County or, lacking that, preventing the construction of the line in Baker County.

**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 including the high level of historic preservation in Baker County, the existence of tourist attractions and the growing contribution of tourism to our economy.

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 [nancypeyron@msn.com](mailto:nancypeyron@msn.com).

DATED: April 1, 2009.



Milo Pope  
Petitioner's Representative  
P. O. Box 50  
Baker City, OR 97814-0050  
[milo@thegeo.net](mailto:milo@thegeo.net)

CERTIFICATE OF SERVICE

Docket No. LC 41

I certify that on April 1, 2009, I served the foregoing Petition to Intervene of Move 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 1, 2009.

A handwritten signature in black ink, appearing to read 'Milo Pope', written over a horizontal line.

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