## BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

LC 50

## **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 secure the rerouting of the proposed Boardman-Hemingway line from 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.

DATED: January 8, 2010

Thomas H. Nelson, OSB 78315

Petitioner's Representative

PO Box 1211

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## **CERTIFICATE OF SERVICE**

I hereby certify that, on January 12, 2010, I served a true and correct copy of Stop Idaho Power's Petition to Intervene in Docket LC50, which was electronically filed with the Commission on January 8, 2010, on the following named persons who have not waived paper service. I have served those who have waived paper service, indicated by "W" in the table below, by email.

W	*DEPARTMENT OF JUST	CICE .

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