

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

Docket No. LC 68

In the Matter of IDAHO POWER  
COMPANY, 2017 Integrated Resource  
Plan.

PETITION TO INTERVENE

Charles H. Gillis, Attorney at Law, petitions to intervene in this proceeding. In support of this petition, the following is provided:

1. The contact information (name, address, email address) of the petitioner is:

Name: Charles H. Gillis  
Company: Charles H. Gillis, Attorney at Law  
Street Address: 1306 Adams Ave.  
City, State, Zip: La Grande, OR 97850  
Email Address: charlie@gillis-law.com  
Telephone: 541-963-2700

Please include this contact on the service list.

2a. The petitioner  will  will not be represented by counsel in this proceeding. The contact information for petitioner's counsel to be included on the service list is:

Name:  
Company:  
Street Address:  
City, State, Zip:  
Email Address:  
Telephone:

2b. Additional contacts to be included on the service list (a petitioner is limited to three contacts on the service list):

Name:  
Company:  
Street Address:  
City, State, Zip:  
Email Address:  
Telephone:

Name:  
Company:  
Street Address:  
City, State, Zip:  
Email Address:  
Telephone:

3. If the petitioner is an organization, the number of members in and the purposes of the organization:

N/A

List of Members attached

4. The nature and extent of the Petitioner's interest in the proceeding is:

I am an attorney representing the interests of a Union County land owner whose ranch property is threatened with condemnation by Idaho Power Company for siting of the proposed B2H power line.

5. The issues the Petitioner intends to raise at the proceeding are:

1. Failure of Idaho Power Company [IPC] to demonstrate in its Integrated Resource Plan why it is in the best interests of Union County residents for IPC to construct a new power line rather than upgrade already existing power lines within Union County. 2. IPC forecast the need for B2H in 2006. B2H will become a stranded asset given the change in energy creation and storage technology and the introduction of Energy Imbalance Marketing which, by using the existing generation and transmission infrastructure more efficiently, can delay the need for new transmission lines.

6. The special knowledge or expertise of the Petitioner that would assist the Commission in resolving the issues in the proceeding is:

I have attended five of the 2016/2017 monthly IPC Integrated Resource Planning [IRP] meetings, reviewed the recently released 2017 IRP, spoken with members of the IRP board and IPC employees at the IPC meetings regarding B2H and its impact on Union County's viewshed and other economic and social factors; attended Local Impact Team meetings in Baker County regarding impacts of B2H on the Sage Grouse population, and attended numerous meetings of interested persons re B2H in both Union and Baker Counties.

7. 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. I or the organization that I represent will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding. OAR 860-001-0300.

/C.Gillis, OSB #101905/ Charles H. Gillis  
Petitioner or Petitioner's Representative

July 20, 2017  
Date Signed