

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

DOCKET NO. PCN 5

In the Matter of

Idaho Power Company's Petition for
Certificate of Public Convenience and
Necessity

PETITION TO INTERVENE

Susan Geer representing Whitetail Forest LLC and Glass Hill State Natural Area 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: Susan Geer representing
Company: Whitetail Forest LLC and Glass Hill State Natural Area
Street Address: 906 Penn Ave
City, State, Zip: La Grande OR 97850
Email Address: susanmgeer@gmail.com
Telephone: 541-519-5815

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: Meg Cooke
Company: Whitetail Forest LLC
Street Address: 1601 Oak St
City, State, Zip: La Grande OR 97850
Email Address: meganlatebird@hotmail.com

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:

Whitetail Forest LLC, consists of 3 members (Susan Geer, Meg Cooke, and David Komlosi). The purpose is to manage 120 acres solely for the benefit of native plants and animals as described in the Glass Hill Natural Area Plan. We are working to get a conservation easement with Blue Mountain Land Trust, in cooperation with Joel Rice, which will include 700 plus additional acres of Rice land not already covered by an existing CE. The combined land area is all part of Glass Hill State Natural Area, located just northwest of La Grande OR.

List of Members attached

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

Whitetail Forest LLC owns and manages land that would be impacted by the proposed Boardman to Hemmingway Transmission Line and have been notified of condemnation of our property. We are interested in protecting our native forest and meadow and the plants and animals that live there, the view, and peace and quiet at our rustic cabins from being damaged permanently and unnecessarily.

Susan Geer is also a professional Botanist/Ecologist with an interest in protecting the integrity of the Glass Hill State Natural Area, especially the montane meadow known as Winn meadow, the rare plants and animals, and particular native plant communities recognized as priority for conservation by the Oregon Natural Areas program. The petitioner also has an interest in the integrity of Twin Lake, an especially pristine pond and wetland that is part of Morgan Lake City Park which deserves protection and is home to an undescribed plant species unique to the site..

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

Ms. Geer, on behalf of Whitetail Forest LLC and Glass Hill State Natural Area intends to raise issues germane to this docket.

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

Ms. Geer is an expert in native plant associations and rare plants of the Blue Mountains, as well as the non-native invasive plant and animal species which threaten them. Ms. Geer has over 30 years experience monitoring native plants and analyzing long-term vegetation data.

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.

/s/ Susan M. Geer

Susan M. Geer representing Whitetail Forest LLC and Glass Hill State Natural Area

Petitioner or Petitioner's Representative

11/26/2022

Date Signed