JOHN W. STEPHENS

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DIRECT DIAL: (503) 935-5393

March 30, 2009

Via Electronic and First Class Mail

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

Re: In the Matter of IDAHO POWER COMPANY: Application for Acknowledgement of February 2009 Addendum to Its 2006 Integrated Resource Plan, PUC Docket

No. LC 41—Petition to Intervene of Renewable Northwest Project

Dear Clerk:

Enclosed please find an original and one copy of Petition to Intervene of Renewable Northwest Project ("RNP"). RNP waives paper service of documents in this docket.

Thank you.

Yours truly,

s/ John W. Stephens

John W. Stephens

JWS/mec cc: Service List Enclosures

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BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

LC 41

In the Matter of) PETITION TO INTERVENE OF
) RENEWABLE NORTHWEST PROJECT
IDAHO POWER COMPANY,)
)
Application for Acknowledgement of)
February 2009 Addendum to Its 2006)
Integrated Resource Plan.)

Pursuant to OAR 860-012-0001, Renewable Northwest Project petitions to intervene as a "party" in this proceeding.

1. The name and address of the petitioner is:

Renewable Northwest Project 917 S.W. Oak, Suite 303 Portland, Oregon 97205 <u>suzanne@rnp.org</u>

2. The name and address of the attorneys representing the petitioner is:

John W. Stephens, Esq. Esler, Stephens & Buckley 888 S.W. Fifth, Suite 700 Portland, Oregon 97204-2021 stephens@eslerstephens.com

3. Petitioner requests that service of documents also be made on:

Suzanne Leta Liou Renewable Northwest Project 917 S.W. Oak, Suite 303 Portland, Oregon 97205 suzanne@rnp.org

Cameron Yourkowski Renewable Northwest Project 917 S.W. Oak, Suite 303 Portland, Oregon 97205 cameron@rnp.org Katie Kalinowski Renewable Northwest Project 917 S.W. Oak, Suite 303 Portland, Oregon 97205 katie@rnp.org

- 4. Petitioner is an advocacy organization whose members include environmental and consumer groups, and businesses who are involved in the development and manufacture of renewable energy projects and products. The purpose of the group is to promote the implementation of environmentally sound, workable renewables in the Northwest.
- 5. Petitioner and its counsel have appeared in numerous utility Integrated Resource Plan and Request for Proposal dockets. In addition, Petitioner's counsel has been actively involved in many general rate cases. Petitioner and its counsel believe that as a consequence of this experience, they have knowledge and expertise that may assist the Commission is resolving the issues in the proceeding.
- 6. Petitioner has sufficient interest in the proceeding and petitioner's appearance and participation will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding.
 - 7. Petitioner waives paper service of documents.

DATED this 30th day of March, 2009.

ESLER, STEPHENS & BUCKLEY

By: s/ John W. Stephens
John W. Stephens
Of Attorneys for Renewable Northwest
Project

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing **PETITION TO INTERVENE OF RENEWABLE NORTHWEST PROJECT** on the following persons on March 30, 2009, by hand-delivering, faxing, e-mailing, or mailing (as indicated below) to each a copy thereof, and if mailed, contained in a sealed envelope, with postage paid, addressed to said attorneys at the last known address of each shown below and deposited in the post office on said day at Portland, Oregon:

Gordon Feighner gordon@oregoncub.org Robert Jenks bob@oregoncub.org G. Catriona McCracken, Esq. catriona@oregoncub.org Citizens' Utility Board of Oregon 610 S.W. Broadway, Suite 308 Portland, Oregon 97205	by hand-delivery by facsimile by first class mail by certified mail, return receipt requested by registered mail, return receipt requested by express mail by e-mail
Jason W. Jones jason.w.jones@state.or.us Assistant Attorney General Janet L. Prewitt janet.prewitt@doj.state.or.us Assistant Attorney General Regulated Utility and Business Section 1162 Court Street N.E. Salem, Oregon 97301-4096	by hand-delivery by facsimile by first class mail by certified mail, return receipt requested by registered mail, return receipt requested by express mail by e-mail
Suzanne Leta Liou suzanne@rnp.org Cameron Yourkowski cameron@rnp.org Katie Kalinowski katie@rnp.org Renewable Northwest Project 917 S.W. Oak, Suite 303 Portland, Oregon 97205	by hand-delivery by facsimile by first class mail by certified mail, return receipt requested by registered mail, return receipt requested by express mail by e-mail
Phil Boyle phil.boyle@state.or.us Public Utility Commission of Oregon P.O. Box 2148 Salem, Oregon 97308-2148	by hand-delivery by facsimile by first class mail by certified mail, return receipt requested by registered mail, return receipt requested by express mail by e-mail

Attorneys at Law 888 S.W. Fifth Avenue, Suite 700 Portland, Oregon 97204-2021 Telephone: (503) 223-1510 Facsimile: (503) 294-3995

Charles H. Combs chcombs@bpa.gov Bonneville Power Administration PO Box 3621 Mail Stop LT-7 Portland, Oregon 97208-3621	by hand-delivery by facsimile by first class mail by certified mail, return receipt requested by registered mail, return receipt requested by express mail by e-mail
Brian Silverstein blsilverstein@bpa.gov VP Planning & Asset Management Bonneville Power Administration Mailstop TP-DITT-2 5411 N.E. Highway 99 Vancouver, Washington 98666-0491	by hand-delivery by facsimile by first class mail by certified mail, return receipt requested by registered mail, return receipt requested by express mail by e-mail
Hon. Dan P. Joyce djoyce@malheurco.org Stephanie Williams swilliams@malheurco.org Malheur County 251 B Street West Vale, Oregon 97918	by hand-delivery by facsimile by first class mail by certified mail, return receipt requested by registered mail, return receipt requested by express mail by e-mail
Lisa F. Rackner, Esq. lisa@mcd-law.com Wendy McIndoo wendy@mcd-law.com McDowell & Rackner, P.C. 520 S.W. Sixth Avenue, Suite 820 Portland, Oregon 97204	by hand-delivery by facsimile by first class mail by certified mail, return receipt requested by registered mail, return receipt requested by express mail by e-mail
Adam Bless adam.bless@state.or.us Vijay A. Satyal vijay.a.satyal@state.or.us Oregon Department of Energy 625 Marion Street N.E., Suite 1 Salem, Oregon 97301-3737	by hand-delivery by facsimile by first class mail by certified mail, return receipt requested by registered mail, return receipt requested by express mail by e-mail
Thomas H. Nelson nelson@thnelson.com Thomas H. Nelson & Associates 24525 E. Welches Road Box 1211 Welches, Oregon 97067	by hand-delivery by facsimile by first class mail by certified mail, return receipt requested by registered mail, return receipt requested by express mail by e-mail

Karl Bokenkamp kbokenkamp@idahopower.com Lisa D. Nordstrom, Esq. lnordstrom@idahopower.com Ric Gale rgale@idahopower.com Mark Stokes mstokes@idahopower.com Monica B. Moen mmoen@idahopower.com Gregory W. Said gsaid@idahopower.com Maggie Brilz mbrilz@idahopower.com Christa Bearry cbearry@idahopower.com Mike Youngblood myoungblood@idahopower.com Idaho Power Company P.O. Box 70 Boise, Idaho 83707-0070 Susan A. Carlson by first class mail by certified mail, return receipt requested by registered mail, return receipt requested by express mail by e-mail by e-mail by e-mail by e-mail creation	Barton L. Kline, Esq.		by hand-delivery
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Lisa D. Nordstrom, Esq. Inordstrom@idahopower.com Ric Gale rgale@idahopower.com Mark Stokes mstokes@idahopower.com Monica B. Moen mmoen@idahopower.com Gregory W. Said gsaid@idahopower.com Mike Youngblood myoungblood@idahopower.com Idaho Power Company P.O. Box 70 Boise, Idaho 83707-0070 Susan A. Carlson PO Box 294 Ontario, Oregon 97914 Bill & Jeanie Coffman 555 Stanton Boulevard Ontario, Oregon 97914 Julie Fulgate 2320 Highway 201 Nyssa, Oregon 97913 by registered mail, return receipt requested by express mail by certified mail, return receipt requested by first class mail by certified mail, return receipt requested by registered mail, return receipt requested by registered mail, return receipt requested by registered mail, return receipt requested by thand-delivery by facsimile by first class mail by certified mail, return receipt requested by registered mail, return receipt requested	•	\bowtie	•
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Mark Stokes mstokes@idahopower.com Monica B. Moen mmoen@idahopower.com Gregory W. Said gsaid@idahopower.com Maggie Brilz mbrilz@idahopower.com Christa Bearry cbearry@idahopower.com Mike Youngblood myoungblood@idahopower.com Mike Youngblood myoungblood@idahopower.com Idaho Power Company P.O. Box 70 Boise, Idaho 83707-0070 Susan A. Carlson PO Box 294 Ontario, Oregon 97914 Dy first class mail by certified mail, return receipt requested by registered mail, return receipt requested by express mail by e-mail Bill & Jeanie Coffman S55 Stanton Boulevard Ontario, Oregon 97914 Dy facsimile by first class mail by certified mail, return receipt requested by express mail by certified mail, return receipt requested by registered mail, return receipt requested by express mail by e-mail Julie Fulgate 320 Highway 201 Nyssa, Oregon 97913 Dy first class mail by certified mail, return receipt requested by express mail by e-mail	Ric Gale		by C-man
mstokes@idahopower.com Monica B. Moen mmoen@idahopower.com Gregory W. Said gsaid@idahopower.com Maggie Brilz mbrilz@idahopower.com Christa Bearry cbearry@idahopower.com Mike Youngblood myoungblood@idahopower.com Idaho Power Company P.O. Box 70 Boise, Idaho 83707-0070 Susan A. Carlson PO Box 294 Ontario, Oregon 97914 Bill & Jeanie Coffman 555 Stanton Boulevard Ontario, Oregon 97914 Bill & Jeanie Coffman by hand-delivery by facsimile by e-mail Bill & Jeanie Coffman by first class mail by e-mail By first class mail by certified mail, return receipt requested by registered mail, return receipt requested by express mail by certified mail, return receipt requested by registered mail, return receipt requested by registered mail, return receipt requested by express mail by e-mail Julie Fulgate Dy hand-delivery by facsimile by hand-delivery by facsimile by e-mail Julie Fulgate Dy hand-delivery by facsimile by first class mail by certified mail, return receipt requested by registered mail, return receipt requested by espress mail by certified mail, return receipt requested	rgale@idahopower.com		
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ESLER, STEPHENS & BUCKLEY Attorneys at Law 888 S.W. Fifth Avenue, Suite 700 Portland, Oregon 97204-2021 Telephone: (503) 223-1510 Facsimile: (503) 294-3995

Stop Idaho Power rogerfindley@q.com 3535 Butte Drive Ontario, Oregon 97914	 by hand-delivery by facsimile by first class mail by certified mail, return receipt requested by registered mail, return receipt requested by express mail by e-mail
DATED this 30 th day of March, 2009.	
E	SLER STEPHENS & BUCKLEY
В	y: s/ John W. Stephens
•	John W. Stephens, OSB No. 773583
	stephens@eslerstephens.com
	Of Attorneys for Renewable Northwest
	Project

ESLER, STEPHENS & BUCKLEY Attorneys at Law 888 S.W. Fifth Avenue, Suite 700 Portland, Oregon 97204-2021 Telephone: (503) 223-1510 Facsimile: (503) 294-3995