

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

Docket No. LC 78

In the Matter of

IDAHO POWER COMPANY,

2021 Integrated Resource Plan (IRP)

STOP B2H Coalition  
PETITION TO INTERVENE

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The STOP B2H Coalition 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: Jim Kreider  
Company:  
Street Address: 60366 Marvin Rd  
City, State, Zip: La Grande, OR 97850  
Email Address: jkreider@campblackdog.org  
Telephone: 541.406.0936

☒ 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: Norm Cimon  
Company:  
Street Address: 1208 First Street  
City, State, Zip: La Grande, OR 97850  
Email Address: ncimon@oregontrail.net  
Telephone: 541 910-5997

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

STOP B2H Coalition

WHO: The “Stop B2H Coalition” is a growing alliance of organizations and public officials that are opposed to the 305 mile Boardman to Hemingway 500kv Transmission line. We have 7 organizational members and 900 individual members on our mailing list

MISSION: We are working to stop the approval and construction of an unneeded 305 mile transmission line through Eastern Oregon and Western Idaho, thereby: protecting environmental, historical and cultural resources; preventing degradation of agricultural and land assets; promoting energy conservation; and supporting the rapid development of new technologies in energy generation, storage and distribution throughout the western region and the USA.

☒ List of Members attached

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

This 2021 IRP contains significantly different data and outcomes than stated in the 2019 IRP. STOP believes Idaho Power has not significantly explained or documented its new methodologies. These new methodologies show a “new need” of over 1,400 MW of resources by 2026. In the 2019 IRP, according IPUC staff, IPC only required 6 MW of new resources by 2026. This increase will cost the ratepayers significantly and needs to be properly vetted.

This “new need” triggered Idaho Powers filing of UM 2210-IPC Waiver of Competitive Bidding Rules. STOP is an intervener in the Oregon’s UM-2210 and Idaho’s IPC-E-21-41 Resource Procurements dockets and will share the information in those dockets with this docket.

Idaho Powers 2021 IRP process with their Integrated Resource Plan Advisory Council (IRPAC) was unfriendly and exclusionary to the general public other than those on its IRPAC. It was so restricted, compared to other years, that STOP filed a complaint with the Oregon and Idaho PUC staff. Participating as an intervener in this docket will allow STOP to ask the questions we were unable to in the IRPAC.

5. The issues the Petitioner intends to raise at the proceeding are:  
The Coalition plans to raise issues that are germane to the 2021 IRP and relate to UM 2210.
6. The special knowledge or expertise of the Petitioner that would assist the Commission in resolving the issues in the proceeding is:

The STOP B2H coalition has participated in Idaho Power’s 2017 and 2019 IRP’s as intervenors in both the Idaho and Oregon dockets. STOP is currently an intervener in Resource Procurements for Capacity Deficiencies UM 2210 and in Idaho in IPC-E-21-43 IPC IRP, and IPC-E-21-41 Resource Procurements.

7. Based on the information provided above in accordance with the Commission's rules of procedure, STOP requests to participate in this proceeding as an intervener. STOP will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding. OAR 860-001-0300.

/s/ Jim Kreider  
Petitioner or Petitioner's Representative

2/24/22  
Date Signed

**STOP B2H Coalition Membership:**

Organizational members as of 1/2022

Greater Hells Canyon Council (GHCC)  
Oregon-California Trails Association (OCTA)  
Oregon Rural Action (ORA)  
Blue Mtn Chapter, Oregon Rural Action  
Range Ecology Group  
Wildlands Defense  
Blue Mountain Alliance

In addition, there are currently 900 individual members on our electronic mailing list.