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IDAHO PUBLIC
UTILITIES COMMISSION

Attorney for petitioner STOP B2H Coalition

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER) CASE NO. IPC-E-21-43
COMPANY'S 2021 INTEGRATED RESOURCE PLAN.) STOP B2H COALITION PETITION
) TO INTERVINE

COMES NOW, the STOP B2H COALITION ("STOP" or "Intervenor"), by and through its attorney, Jack Van Valkenburgh and, pursuant to the Idaho Public Utilities Commission Rules of Procedure, IDAPA 31.01.01.071-073, hereby petitions the Commission for leave to intervene and to appear and participate as a party, and as grounds therefore states as follows:

1) The name and address of the intervener is:

Jim Kreider
STOP B2H Coalition
60366 Marvin Rd
La Grande, OR 97850
541-406-0727
jim@stopb2h.org

2) STOP will be represented in this proceeding by:

Jack Van Valkenburgh
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P.O. Box 531
Boise, ID, 83701
(208) 918-1994
jack@vanvalkenburghlaw.com

Please provide copies of all pleadings, production requests, production responses, Commission orders, and other documents to the names and addresses above. Electronic copies are preferred.

3) STOP is a growing alliance of citizen organizations and individuals who are opposed to the 305 mile Boardman to Hemingway ("B2H") 500kv Transmission line. We have an estimated 900 individual members, many Idaho Power customers in the Oregon service area, and 7 organizational members. Our purpose is to insure the accuracy of the

information presented in support of this facility by all parties involved and provide alternatives to the construction of this 305 mile transmission line through Eastern Oregon and Western Idaho, to wit: fact checking the applicants information; offering alternative ideas and ways of thinking; representing the public of Oregon, specifically Eastern Oregon as we are doing in 2021-22 by attending monthly IRPAC meetings and did in the 2019, 2017 and 2015 IRP's; protecting environmental, historical and cultural resources; ensuring the health, safety, social, and economic well being of our region, preventing the degradation of agricultural, timber, range and other land assets; promoting energy conservation; and supporting the rapid development of new technologies in energy generation, storage and distribution throughout Eastern Oregon, the Mid - C trading HUB and the country.

- 4) Based on the information provided above in accordance with the Commission's rules of procedure, STOP has a direct and substantial interest in this proceeding and its involvement would not unduly broaden the scope of this proceeding, as filed.
- 5) Thus, if granted intervention in this case, STOP will address a variety of issues of importance to the general body of Idaho Power's ratepayers. STOP respectfully submits that it will serve an important role in this proceeding if given the opportunity to participate as a party.

STOP respectfully requests the right to participate in this proceeding and introduce testimony and exhibits, cross examine witnesses, engage in oral argument, file comments, and otherwise fully participate as a party. STOP may seek intervenor funding pursuant to IDAPA 31.01.01.161-165.

WHEREFORE, STOP hereby requests that this Commission grant its Petition to Intervene in this proceeding and to fully appear and participate as a party with all the rights and responsibilities as such.

DATED, this 11th day of February 2022.

Respectfully submitted,

/s/ Jack Van Valkenburgh
Jack Van Valkenburgh
Van Valkenburgh Law, PLLC

/s/ Jim Kreider
Jim Kreider
STOP B2H Coalition

CERTIFICATE OF SERVICE

I HEREBY certify that I have on this 11th day of February 2022, served the foregoing Petition to Intervene by electronic mail to the following:

Electronic mail only (See Order 35058):

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/s/ Jack Van Valkenburgh
Jack Van Valkenburgh