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*Attorney for Idaho Power Company*

**BEFORE THE DEPARTMENT OF WATER RESOURCES  
OF THE STATE OF IDAHO**

IN THE MATTER OF APPLICATION FOR  
TRANSFER NO. 84488,

In the name of LCSC Enterprises LLC

**NOTICE OF PROTEST**

IDAHO POWER COMPANY (the "Protestant"), by and through its attorneys of record, files this *Notice of Protest* to the approval of the above-numbered *Application for Transfer* filed by LCSC ENTERPRISES LLC (the "Applicant").

The initial bases for the protest are as follows:

1. The source of water has been recognized as Trustwater by the State of Idaho as defined in IDAPA 37.03.08.031(a) and mitigation may be required consistent with the ESPA Transfer Spreadsheet, listed as attachment number 5, in the Application for Transfer.

2. The application and supporting documents fail to identify whether mitigation is

**NOTICE OF PROTEST**

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required due to impact on reaches below Milner.

3. For such other and further reasons as may be discovered or set forth at the hearing on this matter.

DATED this 28<sup>th</sup> of November, 2020.

**BARKER ROSHOLT & SIMPSON LLP**

  
\_\_\_\_\_  
John K. Simpson  
*Attorneys for Idaho Power Company*

### CERTIFICATE OF SERVICE

I hereby certify that on this 28<sup>th</sup> day of November, 2020, I served the original of the foregoing **NOTICE OF PROTEST**, by hand-delivering or depositing same in the U.S. Mail, postage prepaid, as indicated, addressed to the following:

Idaho Department of Water Resources  
Idaho Water Center  
322 East Front Street  
Boise, Idaho 83702-7374

☐ U.S. Mail, Postage Prepaid  
☒ Hand Delivery  
☐ Overnight Mail  
☐ Facsimile  
☐ Email

LCSC Enterprises LLC  
433 Las Colinas Blvd. E, Ste. 1290  
Irving, TX 75039-5058

☒ U.S. Mail, Postage Prepaid  
☐ Hand Delivery  
☐ Overnight Mail  
☐ Facsimile  
☐ Email

JCH Engineering & Consulting, PLLC  
Jason C. Helms, P.E.  
6755 N. Albert Lane  
Idaho Falls, ID 83401

☒ U.S. Mail, Postage Prepaid  
☐ Hand Delivery  
☐ Overnight Mail  
☐ Facsimile  
☐ Email

Robert Harris  
Holden, Kidwell, Hahn & Crapo  
1000 Riverwalk Drive, Suite 200  
Idaho Falls, Idaho 83402

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