

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

UE 217

In the Matter of  
PACIFICORP, dba Pacific Power

PETITION TO INTERVENE  
 and WAIVER OF PAPER  
SERVICE

Carling of America 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: Daniel Charbonneau  
Company: Sequoia Partners LLC  
Street Address: 7000 Monument Dr.  
City, State, Zip: Grants Pass, Or. 97526  
Email Address: carling@charter.net  
Telephone: 541-956-1204

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 two contacts on the service list UNLESS waiving paper service):

Name: Glen Nugent  
Company: Cascade Line Builders LLC  
Street Address: 1330 Timberidge Rd.  
City, State, Zip: Grants Pass, 97527  
Email Address: glen.nugent@hotmail.com  
Telephone: 540-660-0936

Name:  
Company:  
Street Address:  
City, State, Zip:  
Email Address:  
Telephone:

Name:  
Company:  
Street Address:  
City, State, Zip:  
Email Address:  
Telephone:

Additional contacts to be included on the service list are listed on an attached sheet.

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

Sequoia Partners LLC. is not an organization nor is it representing any organization.

List of Members attached

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

Sequoia Partners LLC is the owner and developer of Paradise Ranch Resort. The resort has a Jack Nicklaus designed golf course that will have 200 plus residential lots, numerous townhouses, a resort building and numerous related structures. The development is all within Pacific Power service territory. Petitioner will be responsible for development fees charged by Pacific Power.

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

The issue to be raised by the petitioner is the revenue credit in Rule 13, page 3, "Residential Extensions". The rule gives a credit of \$750.00 per residence. The rule was issued January 21, 2002. The credit was based on annual revenue from residences served by Pacific Power. The annual revenue listed in the PUC statbook for 2008 page 7 lists the revenue per home for 2002 at \$758.00. The new annual revenue proposed by Pacific Power will become \$1151.00 as shown on page 614 of their filing. Rule 13 for nonresidential extensions is written to provide more credit with rate increases to the developer. Residential should allow for rate increases like the nonresidential credit. The 2002 residential credit will be costly to the petitioner. The residential development credit should be related to increased annual revenue per home. The petitioner requests that Rule 13, residential, be considered as directly related to Pacific Powers request for an increase in residential rates.

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

Petitioners consultant, Glen Nugent, has extensive knowledge of Pacific Powers Rules and Tariffs. Consultant has previously talked to Pacific Power about the residential credit allowance to resolve the issue before the recent filing.

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 860-012-0001.

/Glen Nugent/  
Petitioner or Petitioner's Representative

\_\_\_\_\_  
Date Signed

## Certificate of Service

I certify that a copy of the Petition to Intervene has been delivered to all parties of record in this proceeding by electronic mail pursuant to OAR 860-013-0070 or by mailing a copy properly addressed with first class postage prepaid to the following parties or attorneys of parties:

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Dated: 04/09/2010

/Glen Nugent/

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