

June 23, 2008

Via Electronic and First Class Mail

Filing Center
Public Utility Commission of Oregon
P.O. Box 2148
Salem, Oregon 97308-2148
PUC.filingcenter@state.or.us

Re: Docket DR 40; In the Matter of Honeywell International, Inc. and Honeywell
Global Finance, LLC and PacifiCorp, dba Pacific Power

Dear Filing Center:

Enclosed please find an original and one copy of Petition to Intervene of the
Natural Resources Defense Council in the above referenced proceeding.

Sincerely,

A handwritten signature in black ink that reads "Ralph Cavanagh". The signature is written in a cursive style with a large initial "R".

Ralph Cavanagh
Senior Attorney

enclosures

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

DR 40

In the Matter of)	
HONEYWELL INTERNATIONAL, INC.)	PETITION TO
and HONEYWELL GLOBAL FINANCE,)	INTERVENE OF
LLC,)	NATURAL RESOURCES
)	DEFENSE COUNCIL
and)	
)	
PACIFICORP, dba PACIFIC POWER)	

Pursuant to OAR 860-012-0001, the Natural Resources Defense Council (NRDC) petitions to intervene as a “party” in this proceeding.

1. The name and address of the petitioner is:

Natural Resources Defense Council
111 Sutter Street, 20th Floor
San Francisco, CA 94104
Tel: 415-875-6100
Fax: 415-875-6161


2. The name and address of the authorized representative of the petitioner is:

Ralph Cavanagh
Senior Attorney and Co-Director, Energy Program
Natural Resources Defense Council
111 Sutter Street, 20th Floor
San Francisco, CA 94104
Tel: 415-875-6100
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3. The petitioner is a nonprofit environmental advocacy organization with more than 18,000 members residing in the State of Oregon. The organization’s purposes include helping the Pacific Northwest achieve a sustainable and affordable electrical energy future, with special emphasis on investment in all cost-effective energy efficiency and renewable resources.

4. Petitioner is interested in defending its Oregon members' interest in accelerated development of solar energy, which holds great promise for reducing the long-term environmental and economic cost of reliable energy services. Petitioner urges the timely resolution of this proceeding in order for important work to continue on expanding solar development in the state of Oregon.
5. Petitioner has extensive knowledge and expertise that would assist the Commission in resolving the issues in this proceeding, including more than thirty years of work in the region and around the country on renewable energy, energy efficiency, and environmental issues. Petitioner has appeared frequently before the Commission on matters including merger and acquisition cases, integrated resource plans, resource procurement proceedings, and general rate cases.
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 23rd day of June, 2008.

By: 

Ralph Cavanagh
Senior Attorney
Natural Resources Defense Council

CERTIFICATE OF SERVICE

I certify that I have this day served the foregoing document upon all parties of record in this proceeding by delivering a copy in person or by mailing a copy properly addressed with first class postage prepaid, or by electronic mail, to the following parties or attorneys of parties:

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**W LEAGUE OF OREGON CITIES
SCOTT WINKELS**

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Dated at San Francisco, CA this 23rd day of June, 2008.

By: _____


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