

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

In the Matter of LC57

PETITION TO INTERVENE

Angus Duncan 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: Angus Duncan
Company: Natural Resources Defense Council
Street Address: 2373 NW Johnson Street
City, State, Zip: Portland, OR 97210
Email Address: aduncan@b-e-f.org
Telephone: 503.248.7695

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: Ralph Cavanagh
Company: Natural Resources Defense Council
Street Address: 111 Sutter Street, 20th Floor
City, State, Zip: San Francisco, CA 94104
Email Address: rcavanagh@nrdc.org
Telephone: 415.875.6100

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

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

The Natural Resources Defense Council, a national organization of 1.4 mm members, advocates on behalf of environmental values in the following areas:

- Curbing Global Warming and Creating the Clean Energy Future
- Reviving the World's Oceans
- Defending Endangered Wildlife and Wild Places
- Protecting Our Health by Preventing Pollution
- Ensuring Safe and Sufficient Water
- Fostering Sustainable Communities

List of Members attached

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

NRDC seeks utility least cost planning procedures and outcomes that recognize and properly value the environmental outcomes of resource and operational choices made in Integrated Resource Planning undertakings.

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

Costs, benefits and environmental outcomes of PacifiCorp's resource planning alternatives, particularly with respect to greenhouse gas emissions and the climate disruption consequences thereof.

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

NRDC brings to the IRP process extensive knowledge of electric utility planning and resource development considerations -- economic, operational, and environmental -- together with representation of the views and interests of several thousand NRDC members who are citizens of Oregon.

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 860-001-0300.

Petitioner or Petitioner's Representative

Date Signed