

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

In the Matter of LC 62

PETITION TO INTERVENE

Natural Resources Defense Council 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, Consultant and Contractor  
Company: Natural Resources Defense Council  
Street Address: 240 SW First Avenue  
City, State, Zip: Portland, OR 97204  
Email Address: aduncan@b-e-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, 20<sup>th</sup> 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:

NRDC, an national environmental organization with 1.4 million members, advocate for conserving environmental values in air, land, water, wildlife, communities, energy and climate.

List of Members attached

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

Petitioner intends to participate in this proceeding to ensure full consideration of low-carbon resource scenarios for serving PacifiCorp customer loads in a manner that is reliable, cost-effective and respectful of important environmental values.

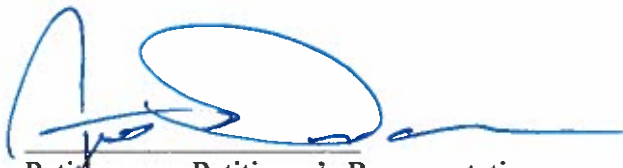
5. The issues the Petitioner intends to raise at the proceeding are:

Petitioner has participated in development of low-carbon IRP scenarios with investor-owned utilities subject to OPUC regulation; and participated as well with State of Oregon agencies (ODEQ; ODOE) in development of State of Oregon carbon policies, and with the Environmental Protection Administration in its development and stakeholder consultation on Clean Air Act carbon regulation. Petitioner wishes to ensure that these scenarios and policies are fully considered in this IRP proceeding.

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

Petitioner has over three decades experience in utility resource planning, selection and development, including tenure on the NW Conservation and Power Planning Council. Petitioner has professional experience in planning for mitigation of greenhouse gas emissions in utility and transportation sectors. Petitioner has direct participation with electric utilities and with the Northwest Power planning Council in resource planning processes, and in shaping low-carbon scenarios.

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.

A handwritten signature in blue ink, consisting of a large, stylized initial 'A' followed by a series of loops and a long horizontal stroke extending to the right.

Petitioner or Petitioner's Representative

January 27, 2015

Date Signed