

BEFORE THE  
PUBLIC UTILITY COMMISSION OF OREGON

In the Matter of PORTLAND GENERAL ) UE 250  
ELECTRIC ANNUAL POWER COST )  
UPDATE TARIFF FOR 2013 ) PETITION TO INTERVENE  
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Noble Americas Energy Solutions, LLC hereby petitions the Public Utility Commission of Oregon (“Commission”), pursuant to ORS § 756.525 and OAR 860-001-0300, for leave to intervene herein and to appear and participate herein as a party, and as grounds therefore states as follows:

1. The name and address of this Intervenor is:

Noble Americas Energy Solutions LLC  
Attn: Greg Bass  
401 West A Street, Suite 500  
San Diego, California 92101  
Telephone: (619) 684-8199  
Fax: (619) 699-5027  
[gbass@noblesolutions.com](mailto:gbass@noblesolutions.com)

Copies of all pleadings, production requests, production responses, Commission orders and other documents should be provided to the following:

Gregory M. Adams  
Richardson & O’Leary, PLLC  
515 N. 27<sup>th</sup> St  
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2. This Intervenor, Noble Americas Energy Solutions, LLC, is a national provider of retail energy services, including in the State of Oregon, and is a certified electricity service supplier (“ESS”) under Oregon law and regulations. *See* Order No. 10-453; Order No. 07-075. Noble Americas Energy Solutions, LLC, claims a direct and substantial interest in this proceeding in that its ability to provide retail energy services in the State of Oregon and more specifically within the service territory of Portland General Electric Company will be affected by the outcome of this proceeding.

3. This Intervenor, in its capacity as an active energy retail services provider intends to participate herein as a party, and if necessary, to introduce evidence, cross-examine witnesses, call and examine witnesses, and be heard in argument. The nature and quality of evidence which this Intervenor will introduce is dependent upon the nature and effect of other evidence in this proceeding.

4. Without the opportunity to intervene herein, this Intervenor would be without any means of participation in this proceeding which may have a material impact on its business activities in the State of Oregon.

5. Granting this Intervenor’s petition to intervene will not unduly broaden the issues nor will it prejudice any party to this case.

**WHEREFORE**, Noble Americas Energy Solutions, LLC respectfully requests that this Commission grant its Petition to Intervene in these proceedings and to appear and participate in all matters as may be necessary and appropriate; and to present evidence, call and examine witnesses, present argument and to otherwise fully participate in these proceedings.

DATED this 30<sup>th</sup> day of April, 2012.

RICHARDSON & O'LEARY, PLLC

*/s/ Gregory M. Adams*

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Attorneys for the Noble Americas Energy  
Solutions, LLC

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 30<sup>th</sup> day of April, 2012, a true and correct copy of the within and foregoing **PETITION TO INTERVENE OF NOBLE AMERICAS ENERGY SOLUTIONS, LLC** was served as follows:

G. Catriona McCracken Robert Jenks CITIZEN'S UTILITY BOARD OF OREGON <a href="mailto:catriona@oregoncub.org">catriona@oregoncub.org</a> <a href="mailto:bob@oregoncub.org">bob@oregoncub.org</a> <a href="mailto:dockets@oregoncub.org">dockets@oregoncub.org</a>	<input type="checkbox"/> Hand Delivery <input type="checkbox"/> U.S. Mail, postage pre-paid <input type="checkbox"/> Facsimile <input checked="" type="checkbox"/> Electronic Mail
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Signed /s/ *Gregory M. Adams*

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Gregory M. Adams