

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UM 1209

In the Matter of the Application of MidAmerican)
Energy Holdings Company and PacifiCorp for an Order) PETITION TO
Authorizing MidAmerican Energy Holdings Company) INTERVENE OF
to Exercise Substantial Influence Over the Policies and) NATURAL RESOURCES
Actions of PacifiCorp.) DEFENSE COUNCIL
)

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
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Tel: 415-875-6100
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2. The name and address of the authorized representative of the petitioner is:

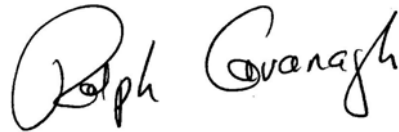
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3. The petitioner is a nonprofit environmental advocacy organization with more than 18,500 members residing in the State of Oregon. The organization's purposes include helping the Pacific Northwest achieve a sustainable and affordable electrical energy future, with special emphasis on investment in all cost-effective energy efficiency and renewable resources.

4. Petitioner's interest in the proceeding reflects PacifiCorp very substantial influence over Oregon's portfolio of energy investments and the state's (and region's) environmental quality. The company is among the Northwest's largest investors in energy efficiency and renewable energy as well as the region's largest single emitter of global warming pollution. The proposed acquisition could significantly affect (for either good or ill) the Company's capacity to contribute to state and regional environmental solutions.
5. The issues that the petitioner intends to raise in the proceeding will help the Commission determine whether the sale would benefit utility billpayers and serve the public interest, including the effect that the MidAmerican acquisition could have on the future of the PacifiCorp's resource planning and investment generally. More specifically, the petitioner intends to address the effect of the transaction on the company's commitment to and capacity to promote energy efficiency, renewable energy, grid enhancement and environmental remediation.
6. Petitioner has extensive knowledge and expertise that would assist the Commission in resolving the issues in this proceeding, including more than a quarter century of work with PacifiCorp on energy efficiency, renewable energy, resource planning and environmental issues. Petitioner's authorized representative, Ralph Cavanagh, has served since 2002 as a member of PacifiCorp's Environmental Forum, a regional body that advises the company on environmental strategies, challenges and priorities.

7. 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.

DATED this 26th day of July, 2005.



By: _____

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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 pursuant to OAR 860-013-0070, to the following parties or attorneys of parties:

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Dated at San Francisco, CA this 26th day of July, 2005.

A handwritten signature in black ink that reads "Shari Walker". The signature is written in a cursive, flowing style.

Shari Walker
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