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July 27, 2005

Via Electronic and US Mail

Public Utility Commission
Attn: Filing Center
550 Capitol St. NE #215
P.O. Box 2148
Salem OR 97308-2148

Re: In the Matter of MIDAMERICAN ENERGY HOLDINGS COMPANY
Application for Authorization to Acquire Pacific Power & Light, dba PacifiCorp
Docket No. UM 1209

Dear Filing Center:

Enclosed please find original and two copies each of the Petition to Intervene and the Notice of Intent to Request an Issue Fund Grant of the Industrial Customers of Northwest Utilities in the above-referenced docket.

Please return one file-stamped copy of each document in the self-addressed, stamped envelope provided. Thank you for your assistance.

Sincerely,

/s/ Christian Griffen
Christian W. Griffen

Enclosures

cc: Service List

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing Petition to Intervene and Notice of Intent to Request an Issue Fund Grant of the Industrial Customers of Northwest Utilities upon the parties on the service list by causing the same to be mailed, postage-prepaid, through the U.S. Mail.

Dated at Portland, Oregon, this 27th day of July, 2005.

/s/ Christian Griffen
Christian W. Griffen

UTILITY WORKERS UNION OF AMERICA PO BOX 37 SAN CLEMENTE CA 92674-0037 uwua@redhabanero.com	DOUGLAS L ANDERSON MIDAMERICAN ENERGY HOLDINGS CO 302 S 36 ST STE 400 OMAHA NE 68131 gerickson@midamerican.com
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JASON W JONES DEPARTMENT OF JUSTICE REGULATED UTILITY & BUSINESS SECTION 1162 COURT ST NE SALEM OR 97301-4096 jason.w.jones@state.or.us	ANDREA L KELLY PACIFICORP 825 NE MULTNOMAH ST STE 800 PORTLAND OR 97232 andrea.kelly@pacificorp.com
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BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1209

In the Matter of)
)
MIDAMERICAN ENERGY HOLDINGS) PETITION TO INTERVENE OF THE
COMPANY) INDUSTRIAL CUSTOMERS OF
) NORTHWEST UTILITIES
)
Application for Authorization to Acquire)
Pacific Power & Light, dba PacifiCorp.)
_____)

Pursuant to ORS § 756.525 and OAR § 860-012-0001, the Industrial Customers of Northwest Utilities (“ICNU”) hereby petitions the Oregon Public Utility Commission (“Commission”) to intervene in this proceeding with full party status as described in OAR § 860-011-0035(5). In support of this petition, ICNU represents as follows:

1. The business address of ICNU is:

Ken Canon
Industrial Customers of Northwest Utilities
333 S.W. Taylor, Suite 400
Portland, OR 97204
2. ICNU will be represented in this proceeding by Davison Van Cleve, P.C.

All documents relating to these proceedings should be served on ICNU’s attorneys at the following address:

Melinda J. Davison
Matthew W. Perkins
Davison Van Cleve, P.C.
333 S.W. Taylor, Suite 400
Portland, OR 97204
E-Mail: mail@dvclaw.com
Telephone: (503) 241-7242
Facsimile: (503) 241-8160

3. ICNU is an incorporated, non-profit association of large industrial electric customers in the Pacific Northwest, with offices in Portland, Oregon. A list of ICNU members is included as Attachment A. Many members of ICNU are customers of PacifiCorp, as indicated on Attachment A.

4. ICNU has a substantial interest in the outcome of this proceeding. MidAmerican Energy Holdings Company (“MidAmerican”) has filed an Application for Authorization to Acquire PacifiCorp. ICNU seeks to intervene in this proceeding to ensure that the proposed acquisition complies with Oregon law and will not harm PacifiCorp’s customers. In Oregon, the transfer of ownership of a public utility such as PacifiCorp must “serve the public utility’s customers in the public interest.” ORS § 757.511(3). To meet this standard, MidAmerican must prove that the acquisition will result in “net benefits” to PacifiCorp’s customers. In re A Legal Standard for Approval of Mergers, Docket UM 1011, Order No. 01-778 at 12 (Sept. 4, 2001).

5. ICNU will review issues regarding the proposed acquisitions’ impacts on rates and the quality of service. This is a preliminary list of customer concerns. As the case proceeds, ICNU intends to raise additional issues.

6. ICNU represents the interests of many of PacifiCorp's largest customers and has participated in many proceedings before the Commission involving PacifiCorp, including ScottishPower's acquisition of the Company. ICNU's intervention in these proceedings will assist the Commission in resolving the issues in this proceeding and will not unreasonably broaden the issues, burden the record, or unreasonably delay this proceeding.

7. As described above, ICNU has a direct and substantial interest in this proceeding that will not be adequately represented by any other party, and may be affected by any Commission determination made in connection with these proceedings. It is in the public interest to allow ICNU to intervene in this proceeding.

WHEREFORE, ICNU respectfully requests that the Commission grant its petition to intervene with full party status in this proceeding.

Dated this 27th day of July, 2005.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Matthew W. Perkins

Melinda J. Davison

Matthew W. Perkins

Davison Van Cleve, P.C.

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Of Attorneys for the Industrial Customers of
Northwest Utilities

ATTACHMENT A
INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

Air Liquide
Air Products
BPB Gypsum, Inc.
Blue Heron Paper Company
Boeing
*Boise Cascade
CNC Containers, Northwest
Chemi-Con Materials Corporation
Dyno Nobel, Inc.
*ConAgra Foods
Eka Chemicals, Inc.
*Evanite Fiber
*Georgia-Pacific
Grays Harbor Paper, L.P.
*Hewlett-Packard
Inland Empire Paper Co.
Intel
*J.R. Simplot
Kimberly-Clark Corporation
Longview Fibre
Microsoft Corporation
*Norpac Foods
Noveon Kalama, Inc.
Oregon Steel Mills
PCC Structural, Inc.
Ponderay Newsprint Co
Shell Oil Products US
Simpson Paper
Simpson Timber
Solar Grade Silicon LLC
Tesoro Refining and Marketing Co.
*Wah Chang
West Linn Paper Company
*Weyerhaeuser

*Denotes PacifiCorp Customers