

1 **BEFORE THE OREGON PUBLIC UTILITIES COMMISSION**

2
3 **UM 1209**

4
5 **In the Matter of**
6
7 **MIDAMERICAN ENERGY HOLDINGS**
8 **COMPANY AND PACIFICORP**
9
10 **Joint Application for an Order**
11 **Authorizing MEHC to Exercise**
12 **Substantial Influence Over the Policies**
13 **and Actions of PacifiCorp**

PETITIONS FOR
INTERVENTION OF:

UTILITY REFORM PROJECT
AND NANCY NEWELL

14
15 1.

16 Pursuant to ORS 756.525 and OAR 860-13-021, the Utility Reform Project
17 (URP) and Nancy Newell petition to intervene in this docket.

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19 2.

20 URP is a non-profit corporation duly incorporated under the laws of Oregon.
21 Its mailing address is 10949 S.W. 4th Avenue, Portland, Oregon 97219. Among its
22 principal purposes is to represent its members and utility ratepayers generally in
23 proceedings before the Oregon Public Utility Commission (OPUC). The Project has
24 more than 30 members, several of whom are ratepayers of Pacific Power & Light
25 Company (PP&L).

26 3.

27 Nancy Newell is a PP&L ratepayer and has been for many years. She resides
28 at:

1 3917 NE Skidmore Street
2 Portland, OR 97211
3 503-288-3986 voice
4 ogec2@hotmail.com
5

6 Nancy Newell has investigated, written, and spoken on issues involving energy,
7 environmental protection, and corporate responsibility for almost 30 years.

8 4.

9 Petitioners herein are represented by:

10 LINDA K. WILLIAMS
11 OSB No. 78425
12 10266 S.W. Lancaster Road
13 Portland, OR 97219
14 503-293-0399 voice
15 503-245-2772 fax
16 linda@lindawilliams.net

DANIEL W. MEEK
OSB No. 79124
10949 S.W. 4th Avenue
Portland, OR 97219
503-293-9021 voice
503-293-9099 fax
dan@meek.net

17
18 Attorney for Nancy Newell

Attorney for URP

19
20 The service list should include the addresses of both attorneys, along with the street
21 and email addresses of Nancy Newell, stated above.

22 5.

23 The issues that Petitioners intend to pursue must await opportunity for discovery.
24 Petitioners seek no alteration to the existing schedule of the proceeding.

25 6.

26 To the extent allowed by the formality of the proceeding, each petitioner intends
27 to engage in some or all of the following actions:

28 a. receive and consider all filings;
29

- b. offer public comment, when allowed;
- c. submit written testimony and exhibits;
- d. call witnesses;
- e. cross-examine witnesses called by others;
- f. file written arguments, briefs, memoranda and motions as directed by the hearings officer or required by the course of proceedings.

7.

URP has participated in dozens of OPUC proceedings and more than a dozen suits against OPUC final orders and have testified at the Oregon Legislature on utility regulation topics for over 20 years.

Dated: August 25, 2005

Respectfully Submitted,

LINDA K. WILLIAMS
OSB No. 78425
10266 S.W. Lancaster Road
Portland, OR 97219
503-293-0399 voice
503-245-2772 fax
linda@lindawilliams.net

DANIEL W. MEEK
OSB No. 79124
10949 S.W. 4th Avenue
Portland, OR 97219
503-293-9021 voice
503-293-9099 fax
dan@mEEK.net

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing PETITIONS FOR INTERVENTION OF: UTILITY REFORM PROJECT AND NANCY NEWELL by:

1. Mailing it to every person on the service list UM 1209 for whom the list on the OPUC web site (including the comma delimited list) this day does not show an email address:

SANDI R TRIPP
KARUK TRIBE DEPT. NATURAL RESOURCES
PO BOX 1016
HAPPY CAMP CA 95546

TROUT UNLIMITED
1300 N 17TH ST, SUITE 500
ARLINGTON VA 22209

MICHAEL W ORCUTT
HOOPA VALLEY TRIBE FISHERIES DEPT
PO BOX 417
HOOPA CA 95546

BARBARA LEE NORMAN
KARUK TRIBE OF CALIFORNIA
PO BOX 657
YREKA OR 96097

EDWARD BARTELL
KLAMATH OFF-PROJECT WATER USERS INC
30474 SPRAGUE RIVER ROAD
SPRAGUE RIVER OR 97639

DAN KEPPEL
KLAMATH WATER USERS ASSOCIATION
2455 PATTERSON STREET, SUITE 3
KLAMATH FALLS OR 97603

2. Emailing it in text-searchable PDF format to following email addresses, provided on the OPUC's UM 1209 web site as of today:

aarms@mbjlaw.com
afogue@orcities.org
andrea.kelly@pacificorp.com
ann@rnp.org
bill@ibew125.com
bkline@idahopower.com
bryan.conway@state.or.us
bwalters@ci.portland.or.us
cberkey@abwwlaw.com
christopher.d.crean@co.multnomah.or.us
cmonson@orcities.org
cotej@mwvcaa.org
d.carlson@doj.state.or.us
danderson@midamerican.com
davidh@norrstev.com
doug.tingey@pgn.com
energlaw@aol.com
fish1ifr@aol.com
gsaid@idahopower.com
janet.prewitt@doj.state.or.us
jason.w.jones@state.or.us
jason@oregoncub.org
jbutler@idahopower.com
jcorbett@yuroktribe.nsn.us

jim@cado-oregon.org
kamcdowell@stoel.com
klovell@tu.org
lfr@aterwynne.com
lowrey@oregoncub.org
mail@dvclaw.com
mbrilz@idahopower.com
mcmoench@midamerican.com
mearly@icnu.org
michael.weirich@state.or.us
mwp@dvclaw.com
nancy@ibew125.com
pge.opuc.filings@pgn.com
philip.h.carver@state.or.us
rcavanagh@nrhc.org
rgale@idahopower.com
sek@aterwynne.com
strothert@americanrivers.org
stephens@eslerstephens.com
steve@nwenergy.org
susananderson@ci.portland.or.us
t.schlosser@msaj.com
uwua@redhabanero.com

Dated: August 25, 2005

Daniel W. Meek