



## **MEMO**

August 23, 2005

TO: Administrative Law Judge Christina M. Smith

FROM: Andrea Fogue, League of Oregon Cities

RE: Testimony on UM 1209

Enclosed you will find an original and one copy of the League's Petition to Intervene in UM 1209, the proceeding before the PUC regarding the matter of MidAmerican Energy Holdings Company and PacifiCorp, and the certificate of service. Please contact me at (503) 507-8275 if you have questions.

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

UM 1209

In the Matter of )  
 )  
MidAmerican Energy Holdings Company )           PETITION TO INTERVENE  
and PacificCorp. )  
 )  
 )  
 )  
 )

NAME OF PETITIONER: League of Oregon Cities, represented by Andrea J. Fogue
ADDRESS: 1201 Court St. NE, Ste. 200, Salem, Oregon 97301
PHONE NUMBER: (503) 588-6550
FAX NUMBER: (503) 399-4863
E-MAIL ADDRESS: afogue@orcities.org

NAME OF COUNSEL FOR PETITIONER: Christy K. Monson
COUNSEL'S ADDRESS: 1201 Court St. NE, Ste. 200, Salem, Oregon 97301
COUNSEL'S PHONE NUMBER: (503) 588-6550
COUNSEL'S FAX NUMBER: (503) 399-4863
COUNSEL'S E-MAIL ADDRESS: cmonson@orcities.org

<b>IF THE PETITIONER IS AN ORGANIZATION, THE NUMBER OF MEMBERS IN AND THE PURPOSES OF THE ORGANIZATION:</b>
The League of Oregon Cities is a voluntary association of 240 incorporated cities throughout the state. The League was founded in 1925 and provides a wide array of services from training and research to policy setting and legislative advocacy.

**NATURE AND EXTENT OF THE PETITIONER'S INTEREST IN THE PROCEEDING:**

The League's membership includes all 100 cities served by Pacific Power. In addition to protecting the interests of cities as consumers of electricity, approximately \$2 million ratepayers reside in Oregon cities.

**THE ISSUES THE PETITIONER INTENDS TO RAISE AT THE PROCEEDING:**

The intent of the League is to address issues of importance to cities in Oregon and their residents. In addition to protecting the interests of cities as consumers of electricity and their ratepayers a primary issue for the League is retaining all local taxes and fees and our ability to manage and receive compensation for the use of local rights of way.

These local taxes and fees are essential to the ability of cities to provide services to meet the needs and expectations of Oregon's citizens and businesses.

**ANY SPECIAL KNOWLEDGE OR EXPERTISE OF THE PETITIONER THAT WOULD ASSIST THE COMMISSION IN RESOLVING THE ISSUES IN THE PROCEEDING:**

The League has been a local government association for over 75 years and has a long history of working with both consumer-owned and investor-owned utilities, the Oregon Public Utility Commission, Bonneville Power Administration, consumer advocates, industry representatives and others to ensure that Oregon communities are provided with reliable, safe, and affordable electric utility service.

In addition, the League has participated in many proceedings before the Public Utility Commission, some of the most recent being AR 394, AR 421, UE 115, UE 116, UE 118, UE 119 and UM 1121

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 860-013-0021.

\_\_\_\_\_  
Petitioner or Petitioner's Representative

\_\_\_\_\_  
Date

CERTIFICATE OF SERVICE

I hereby certify that on August 23, 2005, I mailed an original and one copy of the foregoing PETITION TO INTERVENE ON BEHALF OF THE LEAGUE OF OREGON CITIES to:

PUC ADMINISTRATIVE HEARINGS DIVISION  
ATTN: FILING CENTER  
PO BOX 2148  
SALEM, OR 97308-2148

and on August 23, 2005, I hereby certify that the foregoing document was electronically mailed to all Persons on the Service List maintained by the Public Utility Commission for the UM 1209 proceeding who had an e-mail address posted. I further certify that for those persons on the Service List who were not identified as having an e-mail address, a copy was sent by mail, contained in a sealed envelope, with postage paid, and deposited in the post office at Salem, Oregon on said day.

\_\_\_\_\_  
Andrea J. Fogue, League of Oregon Cities

AMERICAN RIVERS 1025 VERMONT AVE NW, SUITE 720 WASHINGTON DC 20005	NW ENERGY COALITION 219 FIRST ST STE 100 SEATTLE WA 98104
RATES & REGULATORY AFFAIRS PORTLAND GENERAL ELECTRIC RATES & REGULATORY AFFAIRS 121 SW SALMON STREET, 1WTC0702 PORTLAND OR 97204 pge.opuc.filings@pgn.com	TROUT UNLIMITED 1300 N 17TH ST, SUITE 500 ARLINGTON VA 22209
UTILITY WORKERS UNION OF AMERICA PO BOX 37 SAN CLEMENTE CA 92674-0037 uwua@redhabanero.com	JIM ABRAHAMSON -- <b>CONFIDENTIAL</b> COMMUNITY ACTION DIRECTORS OF OREGON 4035 12TH ST CUTOFF SE STE 110 SALEM OR 97302 jim@cado-oregon.org
DOUGLAS L ANDERSON MIDAMERICAN ENERGY HOLDINGS CO 302 S 36 ST STE 400 OMAHA NE 68131 danderson@midamerican.com	SUSAN ANDERSON CITY OF PORTLAND OFFICE OF SUSTAINABLE DEV 721 NW 9TH AVE -- SUITE 350 PORTLAND OR 97209-3447 susananderson@ci.portland.or.us
ADAM S ARMS MCKANNA BISHOP JOFFE & SULLIVAN LLP 1635 NW JOHNSON ST PORTLAND OR 97209 aarms@mbilaw.com	CURTIS G BERKEY ALEXANDER, BERKEY, WILLIAMS & WEATHERS, LLP 2000 CENTER STREET, SUITE 308 BERKELEY CA 94704 cberkey@abwwlaw.com

<p>PORTLAND OR 97209 aarms@mbjlaw.com</p>	<p>cberkey@abwwlaw.com</p>
<p>MAGGIE BRILZ IDAHO POWER COMPANY PO BOX 70 BOISE ID 83707-0070 mbrilz@idahopower.com</p>	<p>LOWREY R BROWN -- <b>CONFIDENTIAL</b> CITIZENS' UTILITY BOARD OF OREGON 610 SW BROADWAY, SUITE 308 PORTLAND OR 97205 lowrey@oregoncub.org</p>
<p>JOANNE M BUTLER IDAHO POWER COMPANY PO BOX 70 BOISE ID 83707-0070 jbutler@idahopower.com</p>	<p>PHIL CARVER OREGON DEPARTMENT OF ENERGY 625 MARION ST NE STE 1 SALEM OR 97301-3742 philip.h.carver@state.or.us</p>
<p>RALPH CAVANAGH -- <b>CONFIDENTIAL</b> NATURAL RESOURCES DEFENSE COUNCIL 111 SUTTER ST FL 20 SAN FRANCISCO CA 94104 rcavanagh@nrdc.org</p>	<p>BRYAN CONWAY PO BOX 2148 SALEM OR 97309-2148 bryan.conway@state.or.us</p>
<p>JOHN CORBETT YUROK TRIBE PO BOX 1027 KLAMATH CA 95548 jcorbett@yuroktribe.nsn.us</p>	<p>JOAN COTE -- <b>CONFIDENTIAL</b> OREGON ENERGY COORDINATORS ASSOCIATION 2585 STATE ST NE SALEM OR 97301 cotej@mwvcaa.org</p>
<p>CHRIS CREAN MULTNOMAH COUNTY 501 SE HAWTHORNE, SUITE 500 PORTLAND OR 97214 christopher.d.crean@co.multnomah.or.us</p>	<p>MELINDA J DAVISON DAVISON VAN CLEVE PC 333 SW TAYLOR, STE. 400 PORTLAND OR 97204 mail@dvclaw.com</p>
<p>MICHAEL EARLY INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES 333 SW TAYLOR STE 400 PORTLAND OR 97204 mearly@icnu.org</p>	<p>JASON EISDORFER -- <b>CONFIDENTIAL</b> CITIZENS' UTILITY BOARD OF OREGON 610 SW BROADWAY STE 308 PORTLAND OR 97205 jason@oregoncub.org</p>
<p>ANN L FISHER AF LEGAL &amp; CONSULTING SERVICES 2005 SW 71ST AVE PORTLAND OR 97225-3705 energlaw@aol.com</p>	<p>JOHN R GALE IDAHO POWER COMPANY PO BOX 70 BOISE ID 83707-0070 rgale@idahopower.com</p>
<p>BERNARDO R GARCIA UTILITY WORKERS UNION OF AMERICA 215 AVENDIA DEL MAR, SUITE M SAN CLEMENTE CA 92672 uwua@redhabanero.com</p>	<p>ANN ENGLISH GRAVATT -- <b>CONFIDENTIAL</b> RENEWABLE NORTHWEST PROJECT 917 SW OAK - STE 303 PORTLAND OR 97205 ann@rnp.org</p>
<p>DAVID E HAMILTON NORRIS &amp; STEVENS 621 SW MORRISON ST STE 800 PORTLAND OR 97205-3825</p>	<p>NANCY HARPER IBEW, LOCAL 125 17200 NE SACRAMENTO GRESHAM OR 97230</p>

<p>JASON W JONES -- <b>CONFIDENTIAL</b>  DEPARTMENT OF JUSTICE  REGULATED UTILITY &amp; BUSINESS  SECTION  1162 COURT ST NE  SALEM OR 97301-4096  jason.w.jones@state.or.us</p>	<p>ANDREA L KELLY  PACIFICORP  825 NE MULTNOMAH ST STE 800  PORTLAND OR 97232  andrea.kelly@pacificorp.com</p>
<p>BARTON L KLINE -- <b>CONFIDENTIAL</b>  IDAHO POWER COMPANY  PO BOX 70  BOISE ID 83707-0070  bkline@idahopower.com</p>	<p>KAITLIN LOVELL -- <b>CONFIDENTIAL</b>  TROUT UNLIMITED  213 SW ASH ST, SUITE 205  PORTLAND OR 97204  klovell@tu.org</p>
<p>KATHERINE A MCDOWELL  STOEL RIVES LLP  900 SW FIFTH AVE STE 1600  PORTLAND OR 97204-1268  kamcdowell@stoel.com</p>	<p>WILLIAM MILLER  IBEW, LOCAL 125  17200 NE SACRAMENTO  GRESHAM OR 97230  bill@ibew125.com</p>
<p>MARK C MOENCH  MIDAMERICAN ENERGY HOLDINGS  CO  2755 E COTTONWOOD PARKWAY,  STE 300  SALT LAKE CITY UT 84171-0400  mcmoench@midamerican.com</p>	<p>BARBARA LEE NORMAN  KARUK TRIBE OF CALIFORNIA  PO BOX 657  YREKA OR 96097</p>
<p>MICHAEL W ORCUTT  HOOPA VALLEY TRIBE FISHERIES  DEPT  PO BOX 417  HOOPA CA 95546</p>	<p>JANET L PREWITT -- <b>CONFIDENTIAL</b>  DEPARTMENT OF JUSTICE  1162 COURT ST NE  SALEM OR 97301-4096  janet.prewitt@doj.state.or.us</p>
<p>LISA F RACKNER -- <b>CONFIDENTIAL</b>  ATER WYNNE LLP  222 SW COLUMBIA ST STE 1800  PORTLAND OR 97201-6618  lfr@aterwynne.com</p>	<p>STEVE ROTHERT  AMERICAN RIVERS  409 SPRING ST, SUITE D  NEVADA CITY CA 95959  srother@americanrivers.org</p>
<p>GREGORY W SAID  IDAHO POWER COMPANY  PO BOX 70  BOISE ID 83707  gsaid@idahopower.com</p>	<p>THOMAS P SCHLOSSER  MORISSET, SCHLOSSER, JOZWIAK &amp; MCGAW  801 SECOND AVE, SUITE 1115  SEATTLE WA 98104-1509  t.schlosser@msaj.com</p>
<p>GLEN H SPAIN -- <b>CONFIDENTIAL</b>  PACIFIC COAST FEDERATION OF  FISHERMEN'S ASSOC  PO BOX 11170  EUGENE OR 97440-3370  fish1ifr@aol.com</p>	<p>JOHN W STEPHENS -- <b>CONFIDENTIAL</b>  ESLER STEPHENS &amp; BUCKLEY  888 SW FIFTH AVE STE 700  PORTLAND OR 97204-2021  stephens@eslerstephens.com</p>
<p>DOUGLAS C TINGEY  PORTLAND GENERAL ELECTRIC  121 SW SALMON 1WTC13  PORTLAND OR 97204  doug.tingey@pgn.com</p>	<p>SANDI R TRIPP  KARUK TRIBE DEPT. OF NATURAL RESOURCES  PO BOX 1016  HAPPY CAMP CA 95546</p>
<p>SARAH WALLACE -- <b>CONFIDENTIAL</b>  ATER WYNNE LLP  222 SW COLUMBIA STE 1800</p>	<p>BENJAMIN WALTERS -- <b>CONFIDENTIAL</b>  CITY OF PORTLAND - OFFICE OF CITY ATTORNEY  1221 SW 4TH AVE - RM 420</p>


