



August 1, 2005

Attn: Christina M. Smith
Administrative Law Judge
Administrative Hearings Division
Public Utility Commission of Oregon
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.**

UM 1209 – Petition to Intervene

Dear Ms. Smith:

Enclosed for filing is an original and five copies of American Rivers' Petition to Intervene in the above-referenced proceeding. Copies of this filing have been served to all parties listed for this proceeding.

If you have any questions or need additional information, please do not hesitate to call.

Sincerely,

Butt Swift FOR

Steve Rothert

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

UM 1209

In the Matter of MIDAMERICAN ENERGY HOLDINGS COMPANY Application for Authorization to Acquire Pacific Power & Light, dba PacifiCorp.	PETITION TO INTERVENE OF AMERICAN RIVERS
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Pursuant to OAR 860-013-0021, American Rivers respectfully petitions the Commission to intervene as a party in this proceeding. In support of this Petition to Intervene, American Rivers asserts the following:

A. American Rivers' principal address is:

1025 Vermont Avenue, NW
Suite 720
Washington, DC 20005

B. American Rivers will be represented by its Associate Director for the Dams Program, Steve Rothert, who is designated for service of all documents in this matter at the following address:

Steve Rothert
American Rivers
409 Spring St., Suite D
Nevada City, CA

Phone: 530-478-5672
Fax: 530-478-5849
srothert@americanrivers.org

C. American Rivers is a national, nonprofit, conservation organization with over 30,000 members throughout the nation including Oregon and California. American Rivers is dedicated to preserving, protecting, and enhancing the natural resource values and recreation potential of rivers throughout the United States. American Rivers also promotes public awareness about the importance of healthy rivers and the threats they face. Its programs address flood control and hydropower policy reform, endangered aquatic and riparian species protection, western instream

flow, clean water and urban rivers. One of its principal programs is the protection of rivers from deleterious environmental impacts of hydropower projects. This protection often comes through the development of adequate protection, mitigation, and enhancement measures contained in a hydropower license. American Rivers has significant expertise in the relicensing of hydroelectric projects by the Federal Energy Regulatory Commission (FERC) pursuant to the Federal Power Act. Relevant to this proceeding, American Rivers has a significant interest in the health of the rivers on which Pacific Power & Light (PacifiCorp) has FERC-licensed hydropower projects, including the Klamath, North Umpqua and Lewis Rivers.

D. On behalf of its members, including those in the Company's service territory and those affected by its hydropower projects, American Rivers works directly with PacifiCorp in the FERC relicensing proceedings for its hydropower projects to ensure that relicensing leads to improvements in the environment. The Federal Power Act sets forth numerous environmental requirements that must be met in order for PacifiCorp to relicense its hydropower projects. Relicensing proceedings determine the Company's ability to continue to generate hydropower for the next 30 to 50 years as well as the conditions under which such generation will occur. It is important to note that relicensing of a hydropower project is a new commitment of resources and provides an opportunity to reevaluate the use to which our public resources are being put; as such, the ability of the Company to meet its environmental obligations is critical to the ability to continue to generate power. Particularly relevant to this proceeding, American Rivers has been and continues to be actively engaged in PacifiCorp's relicensing proceedings throughout Oregon, California and Washington. We recently entered into settlement negotiations with PacifiCorp for the relicensing of the Company's Klamath River Hydroelectric Project and look forward to developing a scientifically credible package of protection, mitigation, and enhancement measures to guide future operations of the project. Such a settlement will reduce the potential for litigation and uncertainty regarding future operations. American Rivers' interests in this proceeding are to ensure that any change in ownership does not affect PacifiCorp's ability to perform under these relicensing agreements, in particular the ability and commitment to finance and carry out the environmental conditions necessary to meet the legal requirements of relicensing. The inability to meet such commitments would threaten the any agreement and would call into question the long-term ability of the Company to generate hydropower, which in turn, may increase overall

costs to ratepayers. Our interests further extend to preventing this pending sale from adversely affecting PacifiCorp's ability to make, in the usual course of licensing proceedings, financial commitments to provide protection, mitigation, and enhancement measures related to natural resources affected by the projects. In view of American Rivers interests, including those of its members in the Company's service territory, American Rivers petitions to enter this proceeding to ensure that PacifiCorp continues to move forward on these commitments in good faith.

American Rivers' involvement will not unreasonably broaden the issues, burden the record nor delay the proceeding. We bring to this proceeding considerable expertise in the FERC licensing context. For the reasons stated above, American Rivers respectfully requests that it be allowed to intervene in this matter.

Dated this 1st day of August, 2005.

Respectfully submitted,

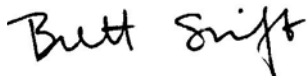
Butt Swift FOR

Steve Rothert, Associate Director

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing PETITION TO INTERVENE OF AMERICAN RIVERS upon all parties of record to this proceeding. Service has been made via regular mail or electronic mail.

Dated this 1st day of August, 2005

A handwritten signature in black ink that reads "Brett Swift". The signature is written in a cursive style with a horizontal line underneath it.

Brett Swift
American Rivers