

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

UM-1209

In the Matter of	)	PETITION TO INTERVENE OF
	)	THE PACIFIC COAST
MIDAMERICAN ENERGY	)	FEDERATION OF FISHERMEN’S
HOLDINGS COMPANY	)	ASSOCIATIONS (“PCFFA”)
	)	
Application for Authorization to Acquire	)	
Pacific Power & Light, dba PacifiCorp and	)	
To Exercise Substantial Influence Over the	)	
Policies and Actions of PacifiCorp	)	

1. Pursuant to ORS §756.525 and OAR §860-013-065, the Pacific Coast Federation of Fishermen’s Associations (“PCFFA”), hereby petitions to intervene in this proceeding and seeks party status as provided by OAR §860-001-0035(5). Petitioner is aware that a schedule has already been established in the proceeding, but is petitioning to intervene within the time frame designated for such intervention petitions in the Administrative Law Judge’s Memorandum of July 15, 2005, i.e., prior to August 2, 2005.

2. The name and address of the Petitioner is:

The Pacific Coast Federation of Fishermen’s Associations  
C/o Glen H. Spain, Northwest Regional Director  
PO Box 11170, Eugene, OR 97440-3370  
(541)689-2000 Fax: (541)689-2500  
Email: fish1ifr@aol.com  
Web: www.pcffa.org

PCFFA staff member Glen H. Spain, as Northwest Regional Directors, will represent the interests of PCFFA in this proceeding. PCFFA consents to service on the above contact at that address for all future purposes in this proceeding, including service by email.

PCFFA is not currently represented by legal counsel, but may, at its option, appoint such legal counsel in the future, in which case it will inform PUC staff accordingly.

3. Petitioner is the west coast's largest trade association of commercial fishing families on the west coast. The purpose of the organization is to protect the interests of commercial fishing families and the natural fishery resources (including salmon populations and their riverine habitat) which PCFFA members depend upon for their livelihoods. Commercial salmon fisheries that may be affected by one of several PacifiCorp hydropower dams, in particular but not limited to, those in the Klamath Basin that are currently up for FERC relicensing in early 2006.

4. PCFFA has intervened regarding the future operations of PacifiCorp hydropower dams in other proceedings, in particular the FERC proceedings for the relicensing of the Klamath Hydroelectric Project, and in the PacifiCorp rate case before this PUC, Dockets UE-171 and UE-170. PCFFA expects to raise similar concerns in this proceeding as deemed necessary.

5. Since numerous PacifiCorp hydropower dams directly affect salmon fisheries our members depend upon for their livelihoods, PCFFA has sufficient interest in these proceedings to become an Intervener, and its appearance as an Intervener will not unreasonably burden the issues, broaden the record, or unreasonably delay the proceeding. PCFFA also has knowledge and expertise that may assist the Commission in resolving relevant issues in this proceeding.

DATED: this 1<sup>st</sup> of August, 2005

PACIFIC COAST FEDERATION OF  
FISHERMEN'S ASSOCIATIONS

By: \_\_\_\_\_  
Glen H. Spain, J.D.  
Northwest Regional Director

Proof of Service Attached

**PROOF OF SERVICE**

I hereby certify that I have delivered a true and accurate copy of this Petition to the current Service List attached, by U. S. mail, first class postage prepaid, on August 1, 2005, and electronic email filing and notice to the email service list maintained in this docket, plus made arrangements to deliver the original and five (5) copies on the Oregon PUC office (either by U.S. mail or hand delivery) by the morning of August 2, 2005.

August 1, 2005

/s/ \_\_\_\_\_  
Glen H. Spain

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
RALPH CAVANAGH NATURAL RESOURCES DEFENSE COUNCIL 111 SUTTER ST FL 20 SAN FRANCISCO CA 94104 rcavanagh@nrdc.org	MELINDA J DAVISON DAVISON VAN CLEVE PC 333 SW TAYLOR, STE. 400 PORTLAND OR 97204 mail@dvclaw.com
BERNARDO R GARCIA UTILITY WORKERS UNION OF AMERICA 215 AVENDIA DEL MAR, SUITE M SAN CLEMENTE CA 92672 uwua@redhabanero.com	ANN ENGLISH GRAVATT RENEWABLE NORTHWEST PROJECT 917 SW OAK - STE 303 PORTLAND OR 97205 ann@rnp.org
JASON W JONES -- <b>CONFIDENTIAL</b> 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
KATHERINE A MCDOWELL STOEL RIVES LLP 900 SW FIFTH AVE STE 1600 PORTLAND OR 97204-1268 kamcdowell@stoel.com	MARK C MOENCH MIDAMERICAN ENERGY HOLDINGS CO 2755 E COTTONWOOD PARKWAY, STE 300 SALT LAKE CITY UT 84171-0400 mcmoench@midamerican.com
MATTHEW W PERKINS DAVISON VAN CLEVE PC 333 SW TAYLOR, STE 400 PORTLAND OR 97204 mwp@dvclaw.com	JOHN W STEPHENS ESLER STEPHENS & BUCKLEY 888 SW FIFTH AVE STE 700 PORTLAND OR 97204-2021 stephens@eslerstephens.com
MICHAEL T WEIRICH DEPARTMENT OF JUSTICE REGULATED UTILITY & BUSINESS SECTION 1162 COURT ST NE SALEM OR 97301-4096 michael.weirich@state.or.us	