

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UM 1209

In the Matter of the Application of )  
MidAmerican Energy Holdings Company ) PETITION TO INTERVENE OF  
and PacifiCorp for an Order Authorizing ) RENEWABLE NORTHWEST PROJECT  
MidAmerican Energy Holdings Company )  
to Exercise Substantial Influence Over the )  
Policies and Actions of PacifiCorp. )

Pursuant to OAR 860-11-065, Renewable Northwest Project petitions to intervene as a “party” in this proceeding. Petitioner is aware that a schedule has already been established in the proceeding, and it agrees to follow the schedule and not to seek to change the schedule.

1. The name and address of the petitioner is:

Renewable Northwest Project  
917 S.W. Oak, Suite 303  
Portland, Oregon 97205  
[ann@rnp.org](mailto:ann@rnp.org)

2. The name and address of the attorneys representing the petitioner is:

John W. Stephens, Esq.  
Esler, Stephens & Buckley  
888 S.W. Fifth, Suite 700  
Portland, Oregon 97204-2021  
[stephens@eslerstephens.com](mailto:stephens@eslerstephens.com)

3. Petitioner requests that service of documents also be made on:

Ann Gravatt  
Renewable Northwest Project  
917 S.W. Oak, Suite 303  
Portland, Oregon 97205  
[ann@rnp.org](mailto:ann@rnp.org)

4. Petitioner is an advocacy organization sponsored by environmental and consumer groups, energy efficiency companies, and renewable resource developers. The purpose of the

group is to promote the implementation of environmentally sound, workable renewables in the Northwest.

5. Petitioner expects to address what effect MidAmerican Energy Holdings Company's purchase of PacifiCorp might have on the future of renewable energy and least cost planning at PacifiCorp and its effect on ratepayers and Oregonians generally.

6. Petitioner and its counsel have appeared in past PacifiCorp least cost plan proceedings. They have also appeared in several dockets involving electric utility acquisitions. Petitioner's counsel has been actively involved in many general rate cases. Petitioner and its counsel believe that as a consequence of this experience, they have knowledge and expertise that may assist the Commission in resolving the issues in the proceeding.

7. Petitioner has sufficient interest in the proceeding and the petitioner's appearance and participation will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding.

DATED this 19<sup>th</sup> day of July, 2005.

ESLER, STEPHENS & BUCKLEY

By:           /s/ John W. Stephens            
John W. Stephens  
Of Attorneys for Renewable Northwest  
Project

**CERTIFICATE OF SERVICE**

I hereby certify that I served the foregoing **PETITION TO INTERVENE OF RENEWABLE NORTHWEST PROJECT** on the following persons on July 19, 2005, by hand-delivering, faxing, or mailing (as indicated below) to each a copy thereof, and if mailed, contained in a sealed envelope, with postage paid, addressed to said attorneys at the last known address of each shown below and deposited in the post office on said day at Portland, Oregon:

Douglas L. Anderson  
MidAmerican Energy Holdings Co.  
302 S. 36 Street, Suite 400  
Omaha, Nebraska 68131  
[gerickson@midamercon.com](mailto:gerickson@midamercon.com)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Ann English Gravatt  
Renewable Northwest Project  
917 S.W. Oak, Suite 303  
Portland, Oregon 97205  
[ann@rnp.org](mailto:ann@rnp.org)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Andrea L. Kelly  
PacifiCorp  
825 N.E. Multnomah, Suite 800  
Portland, Oregon 97232  
[andrea.kelly@pacificorp.com](mailto:andrea.kelly@pacificorp.com)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Katherine A. McDowell, Esq.  
Stoel Rives, LLP  
900 S.W. Fifth Avenue, Suite 1600  
Portland, Oregon 97204-1268  
[kamcdowell@stoel.com](mailto:kamcdowell@stoel.com)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

Mark C. Moench  
MidAmerican Energy Holdings Co.  
2755 E. Cottonwood Parkway, Suite 300  
Salt Lake City, Utah 84171-0400  
[memoench@midamerican.com](mailto:memoench@midamerican.com)

- by hand-delivery
- by facsimile
- by first class mail
- by certified mail, return receipt requested
- by registered mail, return receipt requested
- by express mail
- by e-mail

DATED this 19<sup>th</sup> day of July, 2005.

ESLER STEPHENS & BUCKLEY

By:           /s/ John W. Stephens            
John W. Stephens, OSB No. 77358  
Of Attorneys for Renewable Northwest  
Project

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