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August 2, 2005

**VIA EMAIL [puc.filingcenter@state.or.us](mailto:puc.filingcenter@state.or.us)  
and U.S. MAIL**

Public Utility Commission of Oregon  
Attn: Filing Center  
550 Capital St. NE, Suite 215  
PO Box 2148  
Salem, OR 97308

Re: In the Matter of MIDAMERICAN ENERGY HOLDINGS COMPANY  
APPLICATION FOR AUTHORIZATION TO ACQUIRE PACIFICORP, dba  
PACIFIC POWER & LIGHT COMPANY  
**Docket No. UM-1209**

Dear Public Utility Commission:

Enclosed please find the original and a courtesy copy of the Petition to Intervene of International Brotherhood of Electrical Workers, Local 125 in the above-mentioned matter.

Electronic copies will be emailed to the Records Center on August 2, 2005. Please return one file-stamped copy in the self-addressed, stamped envelope provided.

Thank you for your assistance.

Very truly yours,

MCKANNA BISHOP JOFFE & SULLIVAN, LLP

Adam S. Arms

ASA:jbs  
Enclosure

cc: Bill Miller  
Travis Eri  
Nancy Harper  
Service List

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Attorneys for IBEW, Local 125

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

Docket No. UM-1209

In the Matter of Mid-American Energy	)	
Holdings Company Application for	)	PETITION FOR ORDER
Authorization to Acquire Pacific Power &	)	GRANTING INTERVENTION
Light dba PacifiCorp	)	

The International Brotherhood of Electrical Workers Union, Local 125 (“Local 125” or “Union”) hereby petitions the Commission pursuant to OAR 860-013-0021 for an order granting the Union the right to intervene as an interested party in this proceeding.

The Union’s contact information:

William Miller  
Nancy Harper  
IBEW, Local 125  
17200 NE Sacramento  
Gresham, OR 97230  
(Phone) 503-262-9125  
(Fax) 503-262-9947  
(Email) [bill@ibew125.com](mailto:bill@ibew125.com); [nancy@ibew125.com](mailto:nancy@ibew125.com)

The Union requests all correspondence be sent to the above address.

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The Union's counsel is:

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The Union requests that correspondence be sent directly to the Union, as described above; correspondence need not be copied to the Union's counsel.

The Union is a labor organization within the meaning of 29 USC §152(5). The Union serves as the collective bargaining agent for workers in the electrical utility industry in significant sectors of the Northwest United States. It has labor agreements with approximately 35 employers in the utility industry, including the Bonneville Power Administration, Portland General Electric and PacifiCorp. The Union is the exclusive collective bargaining representative for PacifiCorp's outside electrical service employees working in Washington and northern Oregon. The Union's total membership is approximately 3600. It represents approximately 850 PacifiCorp employees.

The Union represents a substantial number of PacifiCorp employees and has an interest and, indeed, an obligation to safeguard their working conditions, workplace safety, wages, and job security. To the extent that the instant case can affect those matters, the Union has a substantial interest in it.

The Union has special expertise on matters relating to the safety and maintenance of electrical power installations. The Union is involved in training its members extensively in such

areas. It deals daily with these issues, both with PacifiCorp and numerous other utilities throughout Oregon and the Northwest United States. The Union can and would, when appropriate, offer information on these matters and on other workplace issues to assist the Commission in resolving the issues in this proceeding.

Based on the information provided above in accordance with the Commission's rules of procedure, the Union requests to participate in this proceeding as an intervenor.

DATED: August 2, 2005.

Respectfully submitted,

MCKANNA BISHOP JOFFE & SULLIVAN LLP

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John S. Bishop, OSB No. 89022  
Adam S. Arms, OSB No. 01018  
Of Attorneys for IBEW, Local 125

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**CERTIFICATE OF SERVICE**

I hereby certify that I served the foregoing **PETITION FOR ORDER GRANTING**

**INTERVENTION** on:

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by **mailing** a copy thereof in a sealed, first-class postage-paid envelope, addressed to the attorney(s) listed above, and deposited with the United States Postal Service at Portland, Oregon, on the date set forth below.

DATED this \_\_\_\_\_ day of August, 2005.

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