

February 27, 2007

***VIA ELECTRONIC FILING  
AND OVERNIGHT DELIVERY***

Oregon Public Utility Commission  
550 Capitol Street NE, Ste 215  
Salem, OR 97301-2551

Attention: Vikie Bailey-Goggins, Administrator  
Regulatory and Technical Support

RE: Application of MDU Resources Group, Inc. for Authorization to Acquire Cascade  
Natural Gas Corporation in docket No. UM-1283

PacifiCorp (dba Pacific Power & Light Company) submits for filing an original and five  
copies of a Petition to Intervene in the above mentioned proceeding.

It is respectfully requested that all formal correspondence and Staff requests regarding  
this filing be addressed to the following:

By E-mail (preferred): [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)

By regular mail: Data Request Response Center  
PacifiCorp  
825 NE Multnomah, Suite 2000  
Portland, OR 97232

Informal inquiries may be directed to Laura Beane, Regulatory Manager at (503) 813-  
5542.

Sincerely,



Andrea L. Kelly  
Vice President, Regulation



Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1283**

In the Matter of:	)	
Application of MDU Resources	)	
Group, Inc. for Authorization to	)	Petition to Intervene of PacifiCorp
Acquire Cascade Natural Gas	)	
Corporation	)	
	)	

Pursuant to ORS 756.525 and OAR 860-012-0001, PacifiCorp respectfully petitions to intervene in this proceeding. In support of this petition, PacifiCorp states:

1. PacifiCorp is an electric public utility in the state of Oregon and is subject to the jurisdiction of the Public Utility Commission of Oregon (“Commission”).
2. The name and address of PacifiCorp are:

PacifiCorp  
825 NE Multnomah Street  
Portland, OR 97232

Communications concerning this proceeding should be addressed to:

PacifiCorp Oregon Dockets  
825 NE Multnomah, Suite 2000  
Portland, OR 97232  
(503) 813-5542 (telephone)  
(503) 813-6060 (facsimile)  
[OregonDockets@pacificorp.com](mailto:OregonDockets@pacificorp.com)

John Ryan  
Director, Financial Analysis  
PacifiCorp  
825 NE Multnomah, Suite 2000  
Portland, OR 97232  
(503) 813-5601 (telephone)  
(503) 813-6457 (facsimile)  
[john.ryan@PacifiCorp.com](mailto:john.ryan@PacifiCorp.com)

PacifiCorp Regulatory Operations  
825 NW Multnomah Street, Ste 2000  
Portland, OR 97232  
[Regfilings@pacificorp.com](mailto:Regfilings@pacificorp.com)

3. Applicants filed their application pursuant to the provisions of ORS 757.511.

Upon approval of the application and the closing of the proposed transaction, the Applicants will exercise substantial control over the policies and actions of Cascade Natural Gas Corporation within the meaning of ORS 757.511. As an electric public utility in the state of Oregon and being subject to ORS 757.511, PacifiCorp has an interest in the issues raised in this proceeding, including any approval conditions proposed by the parties or the Commission.

4. Since 1988, PacifiCorp itself has filed applications with the Commission regarding changes in ownership, control or corporate structure. In 1988, the Commission approved the merger of the former PacifiCorp, a Maine corporation, with Utah Power & Light Company pursuant to ORS 757.480.<sup>1</sup> In 1999, the Commission issued an order authorizing Scottish Power plc to exercise substantial influence over the policies and actions of PacifiCorp, pursuant to 757.511.<sup>2</sup> In 2001, the Commission granted PacifiCorp Holdings, Inc. authorization under 757.511 to exercise substantial influence over the policies and actions of PacifiCorp.<sup>3</sup> In 2006, the Commission authorized MidAmerican Energy Holdings Company to exercise substantial influence over the policies and actions of PacifiCorp pursuant to 757.511.<sup>4</sup>

5. PacifiCorp has experience with proceedings under 757.511. PacifiCorp's participation here may assist the Commission in resolving the issues before it. PacifiCorp will not unreasonably broaden the issues, burden the record, or unreasonably delay the

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<sup>1</sup> Commission Order No. 88-767 in UF 4000 (July 15, 1988).

<sup>2</sup> Commission Order No. 99-616 in UM 918 (October 6, 1999).

<sup>3</sup> Commission Order No. 01-573 in UM 1021 (July 10, 2001).

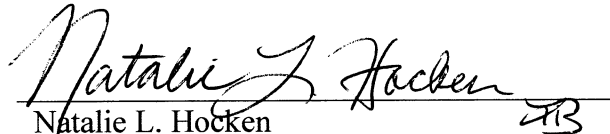
<sup>4</sup> Commission Order No. 06-260 in UM 1209 (May 30, 2006).

proceedings. No other party can adequately represent PacifiCorp's interests in this proceeding.

6. PacifiCorp discussed intervention in this proceeding with MDU Resources Group, Inc.'s counsel, who indicated no objection.

WHEREFORE, PacifiCorp respectfully requests that the Commission grant this petition to intervene.

DATED: February 27, 2007.

A handwritten signature in cursive script that reads "Natalie L. Hocken". The signature is written in black ink and is positioned above a horizontal line. To the right of the signature, there is a small, stylized handwritten mark that appears to be "NH".

Natalie L. Hocken  
Vice President and General Counsel,  
Pacific Power

Counsel for PacifiCorp

I hereby certify that on this 1<sup>st</sup> day of March, 2007, I caused to be served, via E-Mail (if address available), a true and correct copy of PacifiCorp's Petition to Intervene in the Docket No. UM-1283 to the following:

<p>Brian Conway  P.O. Box 2148  Salem, OR 97309-2148  <a href="mailto:Bryan.conway@state.or.us">Bryan.conway@state.or.us</a></p>	<p>Edward A. Finklea  Chad M. Stokes  CABLE HUSTON BENEDICT  HAAGENSEN &amp; LLOYD LLP  1001 SW 5<sup>th</sup> Ste 2000  Portland, OR 97204  <a href="mailto:efinklea@cxhbh.com">efinklea@cxhbh.com</a>  <a href="mailto:estokes@chbh.com">estokes@chbh.com</a></p>
<p>Lowrey R. Brown  Jason Eisdorfer  Robert Jenks  CITIZENS' UTILITY BOARD OF  OREGON  610 SW Broadway Ste 308  Portland, OR 97205  <a href="mailto:lowrey@oregoncub.org">lowrey@oregoncub.org</a>  <a href="mailto:Jason@oregoncub.org">Jason@oregoncub.org</a>  <a href="mailto:bob@oregoncub.org">bob@oregoncub.org</a></p>	<p>Jim Abrahamson  COMMUNITY ACTION DIRECTORS OF  OREGON  P.O. Box 7964  Salem, OR 97301  <a href="mailto:jim@cado-oregon.org">jim@cado-oregon.org</a></p>
<p>Daniel S. Kuntz  MDU RESOURCES GROUP, INC.  P.O. Box 5650  Bismarck, ND 58506-5650  <a href="mailto:Dan.kuntz@mduresources.com">Dan.kuntz@mduresources.com</a></p>	<p>Jason W. Jones  DEPARTMENT OF JUSTICE  Regulated Utility &amp; Business Section  1162 Curt St. NE  Salem OR 97301-4096  <a href="mailto:Jason.w.jones@state.or.us">Jason.w.jones@state.or.us</a></p>
<p>Steven Weiss  NORTHWEST ENERGY  COALITION  4422 Oregon Trail Court NE  Salem, OR 97305  <a href="mailto:steve@nwenergy.org">steve@nwenergy.org</a></p>	<p>Elisa M. Larson  C. Alex Miller  NORTHWEST NATURAL  2200 NW 2<sup>nd</sup> Ave.  Portland, OR 97209  <a href="mailto:Elisa.larson@nwnatural.com">Elisa.larson@nwnatural.com</a>  <a href="mailto:C2m@nwnatural.com">C2m@nwnatural.com</a></p>

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Lawrence Reichman James M. Van Nostrand PERKINS COIE, LLP 1120 NW Couch Street – 10 <sup>th</sup> Floor Portland, OR 97209-4128 <a href="mailto:lreichman@perkinscoie.com">lreichman@perkinscoie.com</a> <a href="mailto:jvannostrand@perkinscoie.com">jvannostrand@perkinscoie.com</a>	



Peggy Ryan  
Supervisor, Regulatory Administration