

1 **BEFORE THE PUBLIC UTILITY COMMISSION**

2 OF OREGON

3 UM 1121

4 In the Matter of	
5 OREGON ELECTRIC UTILITY COMPANY, 6 LLC, et al.	PETITION TO INTERVENE
7 Application for Authorization to Acquire Portland General Electric Company	

8 (1) Name of Petitioner: Oregon Housing and Community Services Department
9 Attn: Jeanne L. Arana
Address 725 Summer Street NE Suite B
10 P.O. Box 14508
Salem, OR 97301
Phone Number (503) 986-6700
11 Fax Number (503) 986-2020
E-mail address jeanne.arana@hcs.state.or.us

12
13 (2) Name of Counsel for Petitioner: K. Dee Carlson/ Lynn T. Nagasako
Counsel's Address Department of Justice
14 General Counsel Division
1162 Court St. NE
Salem, OR 97301-4096
15 Counsel's Phone Number 503-947-4530
Counsel's Fax Number 503-378-6100
16 Counsel's E-mail address d.carlson@doj.state.or.us

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18 (3) If the Petitioner is an Organization, the number of members in and the purposes of the
19 organization:

20 N/A. Petitioner is a State agency.

21 (4) Nature and extent of the petitioner's interest in the proceeding:

22 Petitioner is the State agency responsible for the administration of low-income energy
23 assistance programs in the State, of which Multnomah County's Office of School and
Community Partnerships is a recipient or subrecipient. These programs may be adversely
24 affected by the proposal of Multnomah County.

25 (5) The issues the petitioner intends to raise at the proceeding:

26 (a) The authority of Multnomah County to implement its proposed rate discount program
with Oregon Energy Assistance Program ("OEAP") and Low Income Home Energy
Assistance Program ("LIHEAP") funds.

1 (b) The authority of the Commission to implement the proposed rate discount program with
OEAP and LIHEAP funds.

2 (c) The authority of the Commission to amend or modify any existing contract, or mandate
3 any future contract, between OHCS and Multnomah County involving OEAP or LIHEAP
funds.

4 (6) Any special knowledge or expertise of the petitioner that would assist the Commission in
5 resolving the issues in the proceeding:

6 Petitioner is the State agency responsible for the administration of low-income energy
7 assistance programs in the State, including OEAP and LIHEAP, and Petitioner's special
8 knowledge and expertise will assist the Commission in resolving the issues in the proceeding.

9 Based on the information provided above in accordance with the Commission's rules of
10 procedure, I request to participate in this proceeding as an intervenor. I or the organization that I
11 represent will not unreasonably broaden the issues, burden the record, or unreasonably delay the
12 proceeding. OAR 860-013-0021(2). Because of the expertise of OHCS, it can assist the
13 Commission with its understanding the facts, and with its analysis of the issues. Further, OHCS
14 is prepared to file its testimony within the time period set by the Commission.

15 DATED this ____ day of August 2004.

16 Respectfully submitted,

17 HARDY MYERS
18 Attorney General

19 _____
20 Lynn T. Nagasako, #78119
21 Assistant Attorney General
22 Of Attorneys for Oregon Dept. of Housing and
23 Community Services,
24 State of Oregon, Petitioner
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CERTIFICATE OF SERVICE

I hereby certify that on the _____ day of August 2004, I served the within **PETITION TO INTERVENE** upon known parties to this litigation, by depositing in the United States Post Office at Salem, Oregon, a full, true and correct copy thereof , postage prepaid, and addressed to:

JIM ABRAHAMSON COMMUNITY ACTION DIRECTORS OF OREGON 4035 12TH ST CUTOFF SE STE 110 SALEM OR 97302 jim@cado-oregon.org	SUSAN K ACKERMAN NIPPC PO BOX 10207 PORTLAND OR 97296-0207 susan.k.ackerman@comcast.net
GRIEG ANDERSON 5919 W MILES ST. PORTLAND OR 97219	KEN BEESON EUGENE WATER & ELECTRIC BOARD 500 EAST FOURTH AVENUE EUGENE OR 97440-2148 ken.beeson@eweb.eugene.or.us
JULIE BRANDIS ASSOCIATED OREGON INDUSTRIES 1149 COURT ST NE SALEM OR 97301-4030 jbrandis@aoi.org	KIM BURT WEST LINN PAPER COMPANY 4800 MILL ST WEST LINN OR 97068 kburt@wlinpco.com
J LAURENCE CABLE CABLE HUSTON BENEDICT ET AL 1001 SW 5TH AVE STE 2000 PORTLAND OR 97204-1136 lcable@chbh.com	MICHAEL CARUSO 176 SW HEMLOCK DUNDEE OR 97115 carusodad@hotmail.com
JENNIFER CHAMBERLIN STRATEGIC ENERGY LLC 2633 WELLINGTON COURT CLYDE CA 94520 jchamberlin@sel.com	WILLIAM H CHEN CONSTELLATION NEWENERGY INC 2175 N CALIFORNIA BLVD STE 300 WALNUT CREEK CA 94596 bill.chen@constellation.com
JOAN COTE OREGON ENERGY COORDINATORS ASSOCIATION 2585 STATE ST NE SALEM OR 97301 cotej@mwwcaa.org	CHRIS CREAN MULTNOMAH COUNTY 501 SE HAWTHORNE, SUITE 500 PORTLAND OR 97214 christopher.d.crean@co.multnomah.or.us
MELINDA J DAVISON DAVISON VAN CLEVE PC 1000 SW BROADWAY STE 2460 PORTLAND OR 97205 mail@dvclaw.com	JIM DEASON CABLE HUSTON BENEDICT HAAGENSEN & LLOYD LLP 1001 SW FIFTH AVE STE 2000 PORTLAND OR 97204-1136 jdeason@abh.com

1		jdeason@chbh.com
2	JAMES DITTMER	J JEFFREY DUDLEY
3	UTILITECH INC	PORTLAND GENERAL ELECTRIC
4	740 NW BLUE PKWY STE 204	121 SW SALMON ST 1WTC1301
5	LEE'S SUMMIT MO 64086	PORTLAND OR 97204
6	jdittmer@utilitech.net	jay_dudley@pgn.com
7	GARY DUELL	JASON EISDORFER
8	11301 SE CHARVIEW COURT	CITIZENS' UTILITY BOARD OF OREGON
9	CLACKAMAS, OR OR 97015	610 SW BROADWAY STE 308
10	gduell@bigplanet.com	PORTLAND OR 97205
11	JAMES F FELL	ANN L FISHER
12	STOEL RIVES LLP	AF LEGAL & CONSULTING SERVICES
13	900 SW 5TH AVE STE 2600	1425 SW 20TH STE 202
14	PORTLAND OR 97204-1268	PORTLAND OR 97201
15	jffell@stoel.com	energylaw@aol.com
16	ANDREA FOGUE	SCOTT FORRESTER
17	LEAGUE OF OREGON CITIES	FRIENDS OF THE CLACKAMAS RIVER
18	PO BOX 928	2030 NW 7TH PL
19	1201 COURT ST NE STE 200	GRESHAM OR 97030
20	SALEM OR 97308	clackamas9@aol.com
21	afogue@orcities.org	LORA GARLAND L-7
22	KATHERINE FUTORNICK	BONNEVILLE POWER ADMINISTRATION
23	14800 NE BLUEBIRD HILL LANE	P.O. BOX 3621
24	DAYTON OR 97114	PORTLAND OR 97208-3621
25	futork@onlinemac.com	lmgarland@bpa.gov
26	LEONARD GIRARD	ANN ENGLISH GRAVATT
	2169 SW KINGS COURT	RENEWABLE NORTHWEST PROJECT
	PORTLAND OR 97205	917 SW OAK - STE 303
	lgirard@teleport.com	PORTLAND OR 97205
		ann@rnp.org
	PATRICK G HAGER	ROY HENDERSON
	PORTLAND GENERAL ELECTRIC	PENSION ENHANCEMENT COMMITTEE
	121 SW SALMON ST 1WTC0702	895 NW DALE AVENUE
	PORTLAND OR 97204	PORTLAND OR 97229
	patrick_hager@pgn.com	royhensn@msn.com
	MARY ANN HUTTON	JOE JANSSENS
	CANON AND HUTTON	PGE PENSION ENHANCEMENT COMMITTEE
	9999 NE WORDEN HILL RD	24495 BUTTEVILLE RD NE
	DUNDEE OR 97115-9147	AURORA OR 97002
	mh@canonandhutton.com	jjanssens@pge.com

1	VALARIE KOSS COLUMBIA RIVER PUD PO BOX 1193 SAINT HELENS OR 97051 vkoss@crpud.org	GEOFFREY M KRONICK LC7 BONNEVILLE POWER ADMINISTRATION PO BOX 3621 PORTLAND OR 97208-3621 gmkronick@bpa.gov
2		
3		
4		
5		
6	MICHAEL L KURTZ BOEHM, KURTZ & LOWRY 36 E 7TH ST STE 2110 CINCINNATI OH 45202 mkurtzlaw@aol.com	ROCHELLE LESSNER LANE, POWELL, SPEARS, LUBERSKY LLP 601 SW 2ND AVE. STE. 2100 PORTLAND OR 97204 lessnerr@lanepowell.com
7		
8		
9	KEN LEWIS 2880 NW ARIEL TERRACE PORTLAND OR 97210 kl04@mailstation.com	STEVEN G LINS GLENDALE, CITY OF 613 E BROADWAY STE 220 GLENDALE CA 91206-4394 slins@ci.glendale.ca.us
10		
11		
12	JAMES MANION WARM SPRINGS POWER ENTERPRISES PO BOX 960 WARM SPRINGS OR 97761 j_manion@wspower.com	LLOYD K MARBET DON'T WASTE OREGON 19142 S BAKERS FERRY RD BORING OR 97009 marbet@mail.com
13		
14		
15	GORDON MCDONALD PACIFIC POWER & LIGHT 825 NE MULTNOMAH STE 800 PORTLAND OR 97232 gordon.mcdonald@pacificorp.com	DANIEL W MEEK DANIEL W MEEK ATTORNEY AT LAW 10949 SW 4TH AVE PORTLAND OR 97219 dan@meek.net
16		
17		
18	THAD MILLER OREGON ELECTRIC UTILITY COMPANY 222 SW COLUMBIA STREET, SUITE 1850 PORTLAND OR 97201-6618 tmiller6@optonline.com	WILLIAM MILLER IBEW 17200 NE SACRAMENTO PORTLAND OR 97230 bill@ibew125.com
19		
20		
21	CHRISTY MONSON LEAGUE OF OREGON CITIES 1201 COURT ST. NE STE. 200 SALEM OR 97301 cmonson@orcities.org	MICHAEL MORGAN TONKON TORP LLP 888 SW 5TH AVE STE 1600 PORTLAND OR 97204-2099 mike@tonkon.com
22		
23		
24	FRANK NELSON 543 WILLAMETTE CT MCMINNVILLE OR 97128 fnelson@viclink.com	NANCY NEWELL 3917 NE SKIDMORE PORTLAND OR 97211 ogec2@hotmail.com
25		
26	JAMES NOTEBOOM KARNOPP PETERSEN NOTEBOOM ET AL	LISA F RACKNER ATER WYNNE LLP

1	KARNOPP PETERSEN NOTEBOOM ET AL 1201 NW WALL ST STE 300 BEND OR 97701 jdn@karnopp.com	ATER WYNNE LLP 222 SW COLUMBIA ST STE 1800 PORTLAND OR 97201-6618 lfr@aterwynne.com
2		
3	DONALD W SCHOENBECK REGULATORY & COGENERATION SERVICES INC 900 WASHINGTON ST STE 780 VANCOUVER WA 98660-3455 dws@r-c-s-inc.com	REBECCA SHERMAN HYDROPOWER REFORM COALITION 320 SW STARK STREET, SUITE 429 PORTLAND OR 97204 northwest@hydroreform.org
4		
5		
6	JOHN W STEPHENS ESLER STEPHENS & BUCKLEY 888 SW FIFTH AVE STE 700 PORTLAND OR 97204-2021 stephens@eslerstephens.com	BRETT SWIFT AMERICAN RIVERS 320 SW STARK ST, SUITE 418 PORTLAND OR 97204 bswift@amrivers.org
7		
8		
9		
10	MITCHELL TAYLOR ENRON CORPORATION PO BOX 1188 1221 LAMAR - STE 1600 HOUSTON TX 77251-1188 mitchell.taylor@enron.com	LAURENCE TUTTLE CENTER FOR ENVIRONMENTAL EQUITY 610 SW ALDER #1021 PORTLAND OR 97205 nevermined@earthlink.net
11		
12		
13	S BRADLEY VAN CLEVE DAVISON VAN CLEVE PC 1000 SW BROADWAY STE 2460 PORTLAND OR 97205 mail@dvclaw.com	BENJAMIN WALTERS CITY OF PORTAND - OFFICE OF CITY ATTORNEY 1221 SW 4TH AVE - RM 430 PORTLAND OR 97204 bwalters@ci.portland.or.us
14		
15		
16	MICHAEL T WEIRICH DEPARTMENT OF JUSTICE 1162 COURT ST NE SALEM OR 97301-4096 michael.weirich@state.or.us	STEVEN WEISS NORTHWEST ENERGY COALITION 4422 OREGON TRAIL CT NE SALEM OR 97305 steve@nwenergy.org
17		
18		
19	ROBIN WHITE PORTLAND BOMA 1211 SW 5TH AVE STE 2722-MEZZANINE PORTLAND OR 97201 rwhite@bigplanet.com	LORNE WHITTLES EPCOR MERCHANT & CAPITAL (US) INC 1161 W RIVER ST STE 250 BOISE ID 83702 lwhittles@epcor.ca
20		
21		
22	LINDA K WILLIAMS KAFOURY & MCDUGAL 10266 SW LANCASTER RD PORTLAND OR 97219-6305 linda@lindawilliams.net	
23		
24		

25

26

Lynn T. Nagasako, #78119
Assistant Attorney General
Of Attorneys for Defendant