

Peter J. Richardson¹
ISB No. 3195
Richardson & O’Leary
99 East State Street, Suite 200
P.O. Box 7218
Boise, Idaho 83702
Telephone: (208) 938-7901 Tel
Fax: (208) 938-7904 Fax
peter@richardsonandoleary.com

Attorneys for the Sherman County Court

BEFORE THE
PUBLIC UTILITY COMMISSION OF OREGON

IN THE MATTER OF MIDAMERICAN)	
ENERGY HOLDINGS COMPANY)	CASE NO. UM - 1209
APPLICATION FOR AUTHORIZATION TO)	
ACQUIRE PACIFIC POWER & LIGHT, DBA)	MOTION OF THE SHERMAN
PACIFICORP)	COUNTY COURT TO GRANT
)	PETITION TO INTERVENE
)	
)	
)	
)	
)	

COMES NOW, The Sherman County Court, hereinafter referred to as “Sherman County,” and respectfully moves the Commission for its order granting Sherman County’s out of time petition to intervene. Counsel for Sherman County has discussed its intervention with counsel for the Applicant and is able to report that the Applicant does not object to Sherman County’s Petition to Intervene. In addition, Sherman County is restricting the issues it will address to the exploring the renewable energy commitments made by the Applicant in this matter.

¹ Pro hac vice application is pending for Mr. Richardson.

Sherman County is familiar with the proceedings to date in this matter and is willing and able to comply with all of the currently scheduled process and deadlines without burdening the record and without prejudice to any other party.

DATED this ____ day of September, 2005.

Richardson & O'Leary, LLP

By _____
Peter J. Richardson
Attorneys Sherman County Court

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the ____ day of September 2005, a true and correct copy of the within and foregoing MOTION OF THE SHERMAN COUNTY COURT TO GRANT PETITION TO INTERVENE, Case No. UM - 1209, was served by U.S. Mail, postage prepaid, to the parties of record.

Nina Curtis
Administrative Assistant

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing document in docket UM 1209 on the following named person(s) on the date indicated below by

- mailing with postage prepaid
- hand delivery
- facsimile transmission
- Electronic mail

to said person(s) a true copy thereof, contained in a sealed envelope, addressed to said person(s) at his or her last-known address(es) indicated below.

NW Energy Coalition
219 First Street, Suite 100
Seattle, WA 98104

Rates & Regulatory Affairs
Portland General Electric
121 SW Salmon Street, 1WTC0702
Portland, OR 97204
pge.opuc.filings@pgn.com

Adam S. Arms
aarms@mbjlaw.com

Utility Workers Union of America
PO Box 37
San Clemente, CA 92674-0037
uwua@redhabanero.com

Jim Abrahamson
Community Action Directors of Or
4035 12th Street Cutoff SE, Suite 110
Salem, OR 97302
jim@cado-oregon.org

Douglas L. Anderson
MidAmerican Energy Holdings Co
302 S 36 Street, Suite 400
Omaha, NE 68131
gerickson@midamerican.com

Edward Bartell
Klamath Off-Project Water Users, Inc.
30474 Sprague River Road
Sprague River, OR 97639

Curtis G. Berkey
Alexander Berkey Williams
& Weathers
2000 Center Street, Suite 308
Berkey, CA 94704
cberkey@abwwlaw.com

Maggie Brilz
Idaho Power Company
PO Box 70
Boise, ID 83707-0070
mbrilz@idahopower.com

Lowrey R. Brown
Citizens' Utility Board of Oregon
610 SW Broadway, Suite 308
Portland, OR 97205
lowrey@oregoncub.org

Joanne M. Butler
Idaho Power Company
PO Box 70
Boise, ID 83707-0070
jbutler@idahopower.com

D. Kevin Carlson
Dept. of Justice
General Counsel Division
1162 Court Street NE
Salem, OR 97301-4096
d.carlson@doj.state.or.us

Phil Carver
Oregon Department of Energy
625 Marion Street NE, Suite 1
Salem, OR 97301-3742
philip.h.carver@state.or.us

Ralph Cavanagh
Natural Resources Defense Council
111 Sutter Street, FL 20
San Francisco, CA 94104
rcavanagh@nrdc.org

Bryan Conway
Oregon Public Utility Commission
PO Box 2148
Salem, OR 97308-2148
bryan.conway@state.or.us

John Corbett
Yurok Tribe
PO Box 1027
Klamath, CA 95548
jcorbett@yuroktribe.nsn.us

Joan Cote
Oregon Energy Coordinators Assoc
2585 State Street NE
Salem, OR 97301
cotej@mwvcaa.org

Chris Crean
Christopher.d.crean@co.multnomah.or.us

Melinda J. Davison
Davison Van Cleve, PC
333 SW Taylor, Suite 400
Portland, OR 97204
mail@dvclaw.com

Michael Early
Industrial Customers of NW Utilities
333 SW Taylor, Suite 400
Portland, OR 97204
mearly@icnu.org

Jason Eisdorfer
Citizens' Utility Board of Oregon
610 SW Broadway, Suite 308
Portland, OR 97205
jason@oregoncub.org

Ann L. Fisher
energylaw@aol.com

Andrea Fogue
League of Oregon Cities
PO Box 928
Salem, OR 97308
afogue@orcities.org

John R. Gale
Idaho Power Company
PO Box 70
Boise, ID 83707-0070
rgale@idahopower.com

Bernardo R. Garcia
Utility Workers Union of America
215 Avendia Del Mar, Suite M
San Clemente, CA 92672
uwua@redhabanero.com

David E. Hamilton
davidh@norrstev.com

Jason W. Jones
Department of Justice
Regulated Utility & Business Section
1162 Court Street NE
Salem, OR 97301-4096
jason.w.jones@state.or.us

Kaitlin Lovell
Charlton Bonham
klovell@tu.org
cbonham@tu.org

Mark C. Moench
MidAmerican Energy Holdings Co
2755 E. Cottonwood Parkway, Suite
300
Salt Lake City, UT 84171-0400
mcmoench@midamerican.com

Barbara Lee Norman
Karuk Tribe of California
PO Box 657
Yreka, OR 96097
bnorman@karuk.us

Janet L. Prewitt
Department of Justice
1162 Court Street NE
Salem, OR 97301-4096
janet.prewitt@doj.state.or.us

Ann English Gravatt
Renewable Northwest Project
917 SW Oak, Suite 303
Portland, OR 97205
ann@rnp.org

William Miller
Nancy Harper
bill@ibew125.com
nancy@ibew125.com

Barton Kline
Idaho Power Company
PO Box 70
Boise, ID 83707-0070
bkline@idahopower.com

Daniel W. Meek
Attorney at Law
10949 SW 4th Avenue
Portland, OR 97219
dan@meek.net

Christy Monson
League of Oregon Cities
1201 Court Street NE, Suite 200
Salem, OR 97301
cmonson@orcities.org

Matthew W. Perkins
Davison Van Cleve PC
333 SW Taylor, Suite 300
Portland, OR 97204
mwp@dvclaw.com

Lisa F. Rackner
Ater Wynne LLP
222 SW Columbia, Suite 1800
Portland, OR 97201-6618
lfr@aterwynne.com

Steve Rothert
srothert@amrivers.org

Gregory W. Said
Idaho Power Company
PO Box 70
Boise, ID 83707-0070
gsaid@idahopower.com

Thomas P. Schlosser
t.schlosser@msaj.com

Rob Roy Smith
r.smith@msaj.com

Thane Somerville
t.somerville@msaj.com

Glen H. Spain
Pacific Coast Federation of
Fishermen's Associations
PO Box 11170
Eugene, OR 97440-3370
fishlifr@aol.com

John W. Stephens
Esler Stephens & Buckley
888 SW Fifth Avenue, Suite 700
Portland, OR 97204-2021
stephens@eslerstephens.com

Mark Thompson
Public Power Council
1500 NE Irving Street, Suite 200
Portland, OR 97232
mthompson@ppcpdx.org

Douglas C. Tingey
Portland General Electric Co
121 SW Salmon Street, 1WTC1301
Portland, OR 97204
doug.tingey@pgn.com

Sandi R. Tripp
Karuk Tribe
Dept. of Natural Resources
PO Box 1016
Happy Camp, CA 95546
strip@karuk.us

Sarah Wallace
Ater Wynne LLP
222 SW Columbia, Suite 1800
Portland, OR 97201-6618
sek@aterwynne.com

Benjamin Walters
Susan Anderson
bwalters@ci.portland.or.us
susananderson@ci.portland.or.us

Michael T. Weirich
Department of Justice
Regulated Utility & Business Section
1162 Court Street NE
Salem, OR 97301-4096
michael.weirich@state.or.us

Steven Weiss
Northwest Energy Coalition
4422 Oregon Trail Court NE
Salem, OR 97305
steve@nwenergy.org

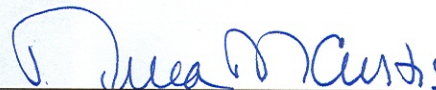
Linda K. Williams
Kafoury & McDougal
10266 SW Lancaster Road
Portland, OR 97219-6305
linda@lindawilliams.net

Michael W. Orcutt
Hoopa Valley Tribe Fisheries Dept.
PO Box 417
Hoopa, CA 95546
director@pcweb.net

Paul Woodin
Western Wind Power
282 Largent Lane
Goldendale, WA 98620
pwoodin@gorge.net

DATED: September 28, 2005

Signed



Nina M. Curtis