

August 2, 2005

Via Electronic and US Mail

Public Utility Commission
Attn: Filing Center
550 Capitol St. NE #215
P.O. Box 2148
Salem, OR 97308-2148

Re: Docket No. UM 1209

*In the Matter of MIDAMERICAN ENERGY HOLDINGS COMPANY,
Application for Authorization to Acquire Pacific Power & Light, dba PacifiCorp*

Dear Filing Center:

Enclosed for filing in Docket No. UM 1209 is an original and two (2) copies of MULTNOMAH COUNTY'S PETITION TO INTERVENE in the above-referenced docket.

Please sign and date stamp the attached blue postcard and return it to me for our records.

Thank you for your assistance.

Sincerely,

 /s/ Lauren Flaherty
Lauren Flaherty
Paralegal for Christopher Crean

CDC:lf
Encl.

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 1209**

In the Matter of
MIDAMERICAN ENERGY HOLDINGS
COMPANY
Application for Authorization to Acquire
Pacific Power & Light, dba Pacificorp.

MULTNOMAH COUNTY’S Petition to
Intervene

1. Pursuant to OAR 860-13-0021 and ORS 756.525, Multnomah County (“County”) petitions to intervene in this proceeding. The County will be represented in this proceeding by Christopher D. Crean, Assistant County Attorney. All documents relating to this proceeding should be served to the County at the following addresses:

Christopher D. Crean
Office of Multnomah County Attorney
501 SE Hawthorne, Suite 500
Portland, OR 97214

2. Multnomah County is a home-rule municipality, organized under the laws of Oregon. A significant portion of Pacific Power & Light’s (“Pacificorp”) service territory is located in Multnomah County, including more than 60,266 residential electric meters. Of these, approximately 25 percent qualify for low-income energy assistance. Low-income energy assistance programs provided by the County include weatherization, bill payment assistance and home repair services.

3. During the period from October, 2003, to April 1, 2004, the County received \$2,056,875 in federal funds to provide low-income energy assistance programs to qualified

households. Of this amount, \$364,628 (12 percent) was paid to Pacificorp on behalf of fixed and low-income households. In addition, during the period July 1, 2003 through March 31, 2004, the County received \$1,063, 017 in public service set-aside funds under ORS chapter 757 for the County's low-income assistance programs. A substantial portion of these funds were received from Pacificorp.

4. Currently, only twelve percent of eligible households actually receive energy assistance services.

5. ORS 757.511(3) requires that MidAmerican Energy Holdings Company ("MidAmerican") demonstrate that its exercise of control over Pacificorp will "serve the public utility's customers in the public interest." The County alleges that Pacificorp and MidAmerican must demonstrate a substantial commitment to low-income energy assistance in order for the acquisition to benefit the public interest.

6. Because the funds available to the County for these services to low-income households may be affected by the proposed acquisition of Pacificorp, the County has a substantial interest in the acquisition. The County has an obligation to advocate for the energy needs of its fixed and low-income residents in this proceeding. Without limiting its ability to raise other issues, the County is concerned about the impact of the acquisition on energy assistance programs for low-income, senior and disabled households.

7. The County's past experience in participating in OPUC utility applications and our continuing cooperation with Pacificorp to provide weatherization and energy assistance programs provide expertise that will assist the Commissioners in their consideration of this

CERTIFICATE OF SERVICE

I hereby certify that on August 1, 2005, I served the foregoing **MULTNOMAH COUNTY'S PETITION TO INTERVENE** on:

UTILITY WORKERS UNION OF AMERICA PO BOX 37 SAN CLEMENTE CA 92674-0037 uwua@redhabanero.com	DOUGLAS L ANDERSON MIDAMERICAN ENERGY HOLDINGS CO 302 S 36 ST STE 400 OMAHA NE 68131 gerickson@midamerican.com
BERNARDO R GARCIA UTILITY WORKERS UNION OF AMERICA 215 AVENDIA DEL MAR, SUITE M SAN CLEMENTE CA 92672 uwua@redhabanero.com	ANN ENGLISH GRAVATT RENEWABLE NORTHWEST PROJECT 917 SW OAK - STE 303 PORTLAND OR 97205 ann@rnp.org
JASON W JONES DEPARTMENT OF JUSTICE REGULATED UTILITY & BUSINESS SECTION 1162 COURT ST NE SALEM OR 97301-4096 jason.w.jones@state.or.us	ANDREA L KELLY PACIFICORP 825 NE MULTNOMAH ST STE 800 PORTLAND OR 97232 andrea.kelly@pacificorp.com
KATHERINE A MCDOWELL STOEL RIVES LLP 900 SW FIFTH AVE STE 1600 PORTLAND OR 97204-1268 kamcdowell@stoel.com	MARK C MOENCH MIDAMERICAN ENERGY HOLDINGS CO 2755 E COTTONWOOD PARKWAY, STE 300 SALT LAKE CITY UT 84171-0400 mcmoench@midamerican.com
JOHN W STEPHENS ESLER STEPHENS & BUCKLEY 888 SW FIFTH AVE STE 700 PORTLAND OR 97204-2021 stephens@eslerstephens.com	MICHAEL T WEIRICH DEPARTMENT OF JUSTICE REGULATED UTILITY & BUSINESS SECTION 1162 COURT ST NE SALEM OR 97301-4096 michael.weirich@state.or.us

by the following method or methods as indicated:

- (X) by **mailing** to said person(s) a true copy thereof, said copy placed in a sealed envelope, postage prepaid and addressed to said person(s) at the last known address for said person(s) as shown above, and deposited in the post office at Portland, Oregon, on the date set forth above.

- (X) by emailing to said person(s) on the date set forth above.

_____/ S /_____
Lauren Flaherty, Paralegal