

Davison Van Cleve PC

Attorneys at Law

TEL (503) 241-7242 • FAX (503) 241-8160 • mail@dvclaw.com
Suite 400
333 S.W. Taylor
Portland, OR 97204

August 24, 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: In the Matter of MIDAMERICAN ENERGY HOLDINGS COMPANY
Application for Authorization to Acquire Pacific Power & Light, dba
PacifiCorp
Docket No. UM 1209

Dear Filing Center:

Enclosed please find an original and two (2) copies of the Petition to Intervene on behalf of the Klamath Off-Project Water Users in the above-captioned Docket No. UM 1209.

Please return one file-stamped copy in the enclosed stamped envelope.

Thank you for your assistance.

Sincerely yours,

/s/ Sheila R. Ho
Sheila R. Ho

Enclosures

cc: Service List (via email)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing Petition to Intervene on behalf of the Klamath Off-Project Water Users, upon the parties on the service list in UM 1209, by causing the same to be emailed.

Dated at Portland, Oregon, this 24th day of August, 2005.

/s/ Sheila R. Ho

AMERICAN RIVERS 1025 VERMONT AVE NW, SUITE 720 WASHINGTON DC 20005	NW ENERGY COALITION 219 FIRST ST STE 100 SEATTLE WA 98104
RATES & REGULATORY AFFAIRS PORTLAND GENERAL ELECTRIC RATES & REGULATORY AFFAIRS 121 SW SALMON STREET, 1WTC0702 PORTLAND OR 97204 pge.opuc.filings@pgn.com	TROUT UNLIMITED 1300 N 17TH ST, SUITE 500 ARLINGTON VA 22209
UTILITY WORKERS UNION OF AMERICA PO BOX 37 SAN CLEMENTE CA 92674-0037 uwua@redhabanero.com	JIM ABRAHAMSON COMMUNITY ACTION DIRECTORS OF OREGON 4035 12TH ST CUTOFF SE STE 110 SALEM OR 97302 jim@cado-oregon.org
DOUGLAS L ANDERSON MIDAMERICAN ENERGY HOLDINGS CO 302 S 36 ST STE 400 OMAHA NE 68131 danderson@midamerican.com	SUSAN ANDERSON CITY OF PORTLAND OFFICE OF SUSTAINABLE DEV 721 NW 9TH AVE -- SUITE 350 PORTLAND OR 97209-3447 susananderson@ci.portland.or.us
ADAM S ARMS MCKANNA BISHOP JOFFE & SULLIVAN LLP 1635 NW JOHNSON ST PORTLAND OR 97209 aarms@mbjlaw.com	CURTIS G BERKEY ALEXANDER, BERKEY, WILLIAMS & WEATHERS, LLP 2000 CENTER STREET, SUITE 308 BERKELEY 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	PHIL CARVER OREGON DEPARTMENT OF ENERGY 625 MARION ST NE STE 1 SALEM OR 97301-3742 philip.h.carver@state.or.us

<p>RALPH CAVANAGH NATURAL RESOURCES DEFENSE COUNCIL 111 SUTTER ST FL 20 SAN FRANCISCO CA 94104 rcavanagh@nrdc.org</p>	<p>BRYAN CONWAY PO BOX 2148 SALEM OR 97309-2148 bryan.conway@state.or.us</p>
<p>JOHN CORBETT YUROK TRIBE PO BOX 1027 KLAMATH CA 95548 jcorbett@yuroktribe.nsn.us</p>	<p>JOAN COTE OREGON ENERGY COORDINATORS ASSOCIATION 2585 STATE ST NE SALEM OR 97301 cotej@mwvcaa.org</p>
<p>CHRIS CREAN MULTNOMAH COUNTY 501 SE HAWTHORNE, SUITE 500 PORTLAND OR 97214 christopher.d.crean@co.multnomah.or.us</p>	<p>MELINDA J DAVISON DAVISON VAN CLEVE PC 333 SW TAYLOR, STE. 400 PORTLAND OR 97204 mail@dvclaw.com</p>
<p>MICHAEL EARLY INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES 333 SW TAYLOR STE 400 PORTLAND OR 97204 mearly@icnu.org</p>	<p>JASON EISDORFER CITIZENS' UTILITY BOARD OF OREGON 610 SW BROADWAY STE 308 PORTLAND OR 97205 jason@oregoncub.org</p>
<p>ANN L FISHER AF LEGAL & CONSULTING SERVICES 2005 SW 71ST AVE PORTLAND OR 97225-3705 energlaw@aol.com</p>	<p>JOHN R GALE IDAHO POWER COMPANY PO BOX 70 BOISE ID 83707-0070 rgale@idahopower.com</p>
<p>BERNARDO R GARCIA UTILITY WORKERS UNION OF AMERICA 215 AVENDIA DEL MAR, SUITE M SAN CLEMENTE CA 92672 uwua@redhabanero.com</p>	<p>ANN ENGLISH GRAVATT RENEWABLE NORTHWEST PROJECT 917 SW OAK - STE 303 PORTLAND OR 97205 ann@mp.org</p>
<p>DAVID E HAMILTON NORRIS & STEVENS 621 SW MORRISON ST STE 800 PORTLAND OR 97205-3825 davidh@norrstev.com</p>	<p>NANCY HARPER IBEW, LOCAL 125 17200 NE SACRAMENTO GRESHAM OR 97230 nancy@ibew125.com</p>
<p>JASON W JONES DEPARTMENT OF JUSTICE REGULATED UTILITY & BUSINESS SECTION 1162 COURT ST NE SALEM OR 97301-4096 jason.w.jones@state.or.us</p>	<p>ANDREA L KELLY PACIFICORP 825 NE MULTNOMAH ST STE 800 PORTLAND OR 97232 andrea.kelly@pacificorp.com</p>
<p>BARTON L KLINE IDAHO POWER COMPANY PO BOX 70 BOISE ID 83707-0070 bkline@idahopower.com</p>	<p>KAITLIN LOVELL TROUT UNLIMITED 213 SW ASH ST, SUITE 205 PORTLAND OR 97204 klovell@tu.org</p>

<p>KATHERINE A MCDOWELL STOEL RIVES LLP 900 SW FIFTH AVE STE 1600 PORTLAND OR 97204-1268 kamcdowell@stoel.com</p>	<p>WILLIAM MILLER IBEW, LOCAL 125 17200 NE SACRAMENTO GRESHAM OR 97230 bill@ibew125.com</p>
<p>MARK C MOENCH MIDAMERICAN ENERGY HOLDINGS CO 2755 E COTTONWOOD PARKWAY, STE 300 SALT LAKE CITY UT 84171-0400 mcmoench@midamerican.com</p>	<p>BARBARA LEE NORMAN KARUK TRIBE OF CALIFORNIA PO BOX 657 YREKA OR 96097</p>
<p>MICHAEL W ORCUTT HOOPA VALLEY TRIBE FISHERIES DEPT PO BOX 417 HOOPA CA 95546</p>	<p>JANET L PREWITT DEPARTMENT OF JUSTICE 1162 COURT ST NE SALEM OR 97301-4096 janet.prewitt@doj.state.or.us</p>
<p>LISA F RACKNER ATER WYNNE LLP 222 SW COLUMBIA ST STE 1800 PORTLAND OR 97201-6618 lfr@aterwynne.com</p>	<p>STEVE ROTHERT AMERICAN RIVERS 409 SPRING ST, SUITE D NEVADA CITY CA 95959 srothert@americanrivers.org</p>
<p>GREGORY W SAID IDAHO POWER COMPANY PO BOX 70 BOISE ID 83707 gsaid@idahopower.com</p>	<p>THOMAS P SCHLOSSER MORISSET, SCHLOSSER, JOZWIAK & MCGAW 801 SECOND AVE, SUITE 1115 SEATTLE WA 98104-1509 t.schlosser@msaj.com</p>
<p>GLEN H SPAIN PACIFIC COAST FEDERATION OF FISHERMEN'S ASSOC PO BOX 11170 EUGENE OR 97440-3370 fish1ifr@aol.com</p>	<p>JOHN W STEPHENS ESLER STEPHENS & BUCKLEY 888 SW FIFTH AVE STE 700 PORTLAND OR 97204-2021 stephens@eslerstephens.com</p>
<p>DOUGLAS C TINGEY PORTLAND GENERAL ELECTRIC 121 SW SALMON 1WTC13 PORTLAND OR 97204 doug.tingey@pgn.com</p>	<p>SANDI R TRIPP KARUK TRIBE DEPT. OF NATURAL RESOURCES PO BOX 1016 HAPPY CAMP CA 95546</p>
<p>SARAH WALLACE ATER WYNNE LLP 222 SW COLUMBIA STE 1800 PORTLAND OR 97201-6618 sek@aterwynne.com</p>	<p>BENJAMIN WALTERS CITY OF PORTLAND - OFFICE OF CITY ATTORNEY 1221 SW 4TH AVE - RM 430 PORTLAND OR 97204 bwalters@ci.portland.or.us</p>
<p>MICHAEL T WEIRICH DEPARTMENT OF JUSTICE REGULATED UTILITY & BUSINESS SECTION 1162 COURT ST NE SALEM OR 97301-4096 michael.weirich@state.or.us</p>	<p>STEVEN WEISS NORTHWEST ENERGY COALITION 4422 OREGON TRAIL CT NE SALEM OR 97305 steve@nwenergy.org</p>

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1209

In the Matter of)	
)	
MIDAMERICAN ENERGY HOLDINGS)	PETITION TO INTERVENE OF THE
COMPANY)	KLAMATH OFF-PROJECT WATER
)	USERS, INC.
)	
Application for Authorization to Acquire)	
Pacific Power & Light, dba PacifiCorp.)	
_____)	

Pursuant to ORS § 756.525 and OAR § 860-012-0001, the Klamath Off-Project Water Users, Inc. (“KOPWU”) hereby submits to the Oregon Public Utility Commission (“OPUC” or the “Commission”) this Petition to Intervene in this proceeding with full party status as described in OAR § 860-011-0035(6). In support of this petition, KOPWU represents as follows:

1. The business address of KOPWU is:

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

2. KOPWU will be represented in this proceeding by Davison Van Cleve,

P.C. All documents relating to these proceedings should be served on KOPWU’s attorney at the following address:

Matthew W. Perkins
Davison Van Cleve, P.C.
333 S.W. Taylor, Suite 400
Portland, OR 97204
E-Mail: mail@dvclaw.com
Telephone: (503) 241-7242
Facsimile: (503) 241-8160

3. KOPWU is a nonprofit association of individuals and businesses in and around the Klamath River Basin. KOPWU's members are located across a broad geographical area of PacifiCorp's service territory. PacifiCorp provides electric service to KOPWU's members in accordance with an April 30, 1956 agreement. KOPWU's members are distinct from other PacifiCorp irrigation customers in the Klamath River Basin in that they are not located on Klamath Project land.

4. KOPWU has a substantial interest in the outcome of this proceeding. MidAmerican Energy Holdings Company has filed an Application for Authorization to Acquire PacifiCorp. Hoopa Valley Tribe, Yurok Tribe, Karuk Tribe, Trout Unlimited, American Rivers, and Pacific Coast Federation of Fishermen's Associations all seek intervention in this proceeding. These parties seek to raise issues related to PacifiCorp's Klamath Hydroelectric Project and water allocation in the Klamath Basin. While these issues and others could substantially impact the rates and quality of service of KOPWU's members, KOPWU does not believe that these issues regarding the Klamath Hydroelectric Project are properly addressed in this docket. KOPWU nevertheless seeks to intervene in this proceeding to address these issues, as necessary, if the Commission allows them to be raised here.

5. KOPWU's intervention will assist the Commission in resolving the issues in this proceeding and will not unreasonably broaden the issues, burden the record, or

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DAVISON VAN CLEVE, P.C.
333 SW Taylor, Suite 400
Portland, OR 97204
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unreasonably delay the proceeding. KOPWU's petition is timely, as the August 29, 2005 due date for interventions has not passed. KOPWU will also accept the record and schedule that have already been established in this proceeding.

6. As described above, KOPWU has a direct and substantial interest in this proceeding that will not be adequately represented by any other party, and may be affected by any Commission determination made in connection with these proceedings. It is in the public interest to allow KOPWU to intervene in this proceeding.

WHEREFORE, KOPWU respectfully requests that the Commission grant this Petition to Intervene with full party status in this proceeding.

Dated this 24th day of August, 2005.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Sarah C. Yasutake

Sarah C. Yasutake

Matthew W. Perkins

333 S.W. Taylor, Suite 400

Portland, Oregon 97204

(503) 241-7242 phone

(503) 241-8160 facsimile

mail@dvclaw.com

Of Attorneys for Klamath Off-Project
Water Users, Inc.