


CABLE HUSTON
CABLE HUSTON BENEDICT HAAGENSEN & LLOYD LLP ■ ATTORNEYS

THOMAS M. GRIM

tgrim@cablehuston.com

June 23, 2008

VIA ELECTRONIC FILING & U.S. MAIL

Oregon Public Utility Commission
Attn: Filing Center
550 Capitol Street, N.E., #215
P.O. Box 2148
Salem, Oregon 97308-2148

Re: In the Matter of the HONEYWELL INTERNATIONAL, INC., and
HONEYWELL GLOBAL FINANCE, LLC, and PACIFICORP
dba PACIFIC POWER
Docket No. DR 40

Dear Filing Center:

Enclosed please find the original and one (1) copy of OREGON PEOPLE'S UTILITY DISTRICT ASSOCIATION'S PETITION TO INTERVENE and WAIVER OF PAPER SERVICE in the above-referenced docket.

Thank you for your assistance with this filing. Should you have any questions, please feel free to contact me.

Very truly yours,



Thomas M. Grim

TMG:tr
Enclosure(s)
cc: Service List

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

DR 40

In the Matter of the)	
)	
HONEYWELL INTERNATIONAL, INC., and HONEYWELL GLOBAL FINANCE, LLC,)	PETITION TO INTERVENE OF OREGON PEOPLE’S UTILITY DISTRICT ASSOCIATION
)	
and)	
)	
PACIFICORP, dba PACIFIC POWER.)	

Pursuant to ORS § 756.525 and OAR § 860-012-0001, the Oregon People’s Utility District Association (“OPUDA”) petitions the Public Utility Commission of Oregon (“OPUC” or “Commission”) to intervene in this proceeding with full party status as described in OAR § 860-011-0035(5). In support of this Petition, OPUDA represents as follows:

1. The business address of OPUDA is:

Oregon People’s Utility District Association
727 Center Street, N.E.
Suite 305
Salem, OR 97301

2. OPUDA will be represented in this proceeding by Cable Huston Benedict Haagensen & Lloyd, LLP. All documents relating to this proceeding should be served on OPUDA and OPUDA’s attorneys at the following addresses:

Danelle Romain
The Romain Group, LLC
707 SW Washington Street, Suite 927
Portland, OR 97205
Telephone: (503) 226-8090
Email: dromain@teleport.com

Thomas M. Grim
Cable Huston Benedict Haagensen
& Lloyd LLP
1001 SW Fifth Ave., Suite 2000
Portland, OR 97204-1136
Telephone: (503) 224-3092
Facsimile: (503) 224-3176
E-Mail: tgrim@cablehuston.com

3. OPUDA is an organization consisting of six Oregon People's Utility Districts¹ organized and operating pursuant to Article XI, Section 12 of the Oregon Constitution and ORS Chapter 261. As people's utility districts, the members of OPUDA are subject to the net-metering obligations of ORS 757.300.

4. Petitioners have requested a Declaratory Ruling from the Commission regarding the applicability of net-metering obligations under ORS 757.300 to certain "customer-generators" as described in the Petition for Declaratory Ruling.

5. The Commission's ruling in this docket may affect the rights and obligations of OPUDA's members with respect to net-metering under ORS 757.300.

6. OPUDA and its members have 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 OPUDA to intervene in this proceeding.

7. OPUDA waives paper service of documents in this proceeding.

///
///
///
///
///
///

¹ The members of OPUDA are Central Lincoln PUD, Clatskanie PUD, Columbia River PUD, Emerald PUD, Northern Wasco PUD, and Tillamook PUD.

WHEREFORE, OPUDA respectfully requests that the Commission grant its petition to intervene with full party status in this proceeding.

Dated this 23th day of June, 2008.

Respectfully submitted,



Thomas M. Grim, OSB No. 88218
Cable Huston Benedict Haagensen & Lloyd LLP
1001 SW Fifth Ave., Suite 2000
Portland, OR 97204-1136
Telephone: (503) 224-3092
Facsimile: (503) 224-3176
E-Mail: tgrim@cablehuston.com

Of Attorneys for the
Oregon People's Utility District Association

CERTIFICATE OF SERVICE

I CERTIFY that I have on this day served the foregoing document upon all parties of record in this proceeding via electronic mail and/or by mailing a copy properly addressed with first class postage prepaid.

MICHAEL T WEIRICH
ASSISTANT ATTORNEY GENERAL
DEPARTMENT OF JUSTICE
REG. UTILITY & BUSINESS SECTION
1162 COURT ST NE
SALEM OR 97301-4096
michael.weirich@doj.state.or.us

JOSEPH REINHART
OSEIA
833 SE MAIN ST, MB #206
PORTLAND OR 97214
joe@oseia.org

MICHELLE R MISHOE
LEGAL COUNSEL
PACIFIC POWER & LIGHT
825 NE MULTNOMAH STE 1800
PORTLAND OR 97232
michelle.mishoe@pacificorp.com

THEODORE FALK
SR ASST ATTORNEY GENERAL
STATE OF OREGON DEPARTMENT OF JUSTICE
1162 COURT STREET NE
SALEM OR 97301-4096
theodore.c.falk@doj.state.or.us

BILL NESSLY
SR ASST ATTY GENERAL
STATE OF OREGON DEPARTMENT OF JUSTICE
1162 COURT STREET NE
SALEM OR 97301-4096
william.nessly@doj.state.or.us

PAUL DAVIES
MANAGER
CENTRAL LINCOLN PUD
PO BOX 1126
NEWPORT OR 97365-0090
pdavies@cencoast.com

PAUL NOLTE
CITY ATTORNEY
CITY HALL
3860 FISHER RD
ROSEBURG OR 97401
law@ashlandhome.net

JANET L PREWITT
ASST AG
DEPARTMENT OF JUSTICE
1162 COURT ST NE
SALEM OR 97301-4096
janet.prewitt@doj.state.or.us

KIP PHEIL
OREGON DEPARTMENT OF ENERGY
625 MARION ST NE - STE 1
SALEM OR 97301-3737
kip.pheil@state.or.us

JAMES MURPHY
DEPT. OF JUSTICE, NATL RESOURCES SECTION
1162 COURT STREET NE
SALEM OR 97301-4096
james.b.murphy@doj.state.or.us

DEBBIE GOLDBERG MENASHE
SENIOR COUNSEL
JOHN M VOLKMAN
GENERAL COUNSEL
ENERGY TRUST OF OREGON
851 SW 6TH AVE SUITE 1200
PORTLAND OR 97204
john.volkman@energytrust.org

JOHN W STEPHENS
KIM T BUCKLEY
ESLER STEPHENS & BUCKLEY
888 SW FIFTH AVE STE 700
PORTLAND OR 97204-2021
stephens@eslerstephens.com
buckley@eslerstephens.com

FRITZ FEITEN
**HONEYWELL BUILDING
SOLUTIONS**
9685 NE BEACHCREST DRIVE
BAINBRIDGE ISLAND WA 98110
fritz.feiten@honeywell.com

SCOTT WINKELS
LEAGUE OF OREGON CITIES
PO BOX 928
SALEM OR 97308
swinkels@orcities.org

J RICHARD GEORGE
ASST GENERAL COUNSEL
PORTLAND GENERAL ELECTRIC CO.
121 SW SALMON ST 1WTC1301
PORTLAND OR 97204
richard.george@pgn.com

JAMES WHITTY
OFFICE OF INNOVATIVE PARTNERSHIPS
OREGON DEPT OF TRANSPORTATION
TRANSPORTATION BLDG, RM 115
355 CAPITOL STREET NE
SALEM OR 97310
jim.whitty@odot.state.or.us

RANDALL DAHLGREN
RATES & REGULATORY AFFAIRS
PORTLAND GENERAL ELECTRIC
121 SW SALMON ST 1WTC 0702
PORTLAND OR 97204
pge.opuc.filings@pgn.com

Dated in Portland, Oregon, this 23th day of June, 2008.



Thomas M. Grim, OSB No. 88218
Cable Huston Benedict Haagensen & Lloyd LLP
1001 SW Fifth Ave., Suite 2000
Portland, OR 97204-1136
Telephone: (503) 224-3092
Facsimile: (503) 224-3176
E-Mail: tgrim@cablehuston.com

Of Attorneys for the
Oregon People's Utility District Association