

# LOVINGER | KAUFMANN LLP

825 NE Multnomah • Suite 925  
Portland, OR 97232-2150

office (503) 230-7715  
fax (503) 972-2921

---

September 21, 2009

***Via Electronic Filing and U.S. Mail***

Public Utility Commission of Oregon  
Attention: Filing Center  
PO Box 2148  
Salem, OR 97308-2148

Re: IN THE MATTER OF PUBLIC UTILITY COMMISSION OF OREGON  
INVESTIGATION TO DETERMINE IF PORTLAND GENERAL ELECTRIC'S  
RATE REVISION HAS BEEN CONSISTENT WITH THE METHODOLOGIES  
AND CALCULATIONS REQUIRED BY ORDER NO. 05-584 (UM 1443)

Attention Filing Center:

Enclosed for filing in the above-captioned docket are an original and one copy of *PacifiCorp's Petition to Intervene*.

An extra copy of this cover letter is enclosed. Please date stamp the extra copy and return it to me in the envelope provided.

Thank you in advance for your assistance.

Sincerely,



Jeff Lovinger

cc: UM 1443 Service List

Enclosures

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

UM 1443

IN THE MATTER OF PUBLIC UTILITY  
COMMISSION OF OREGON  
INVESTIGATION TO DETERMINE IF  
PORTLAND GENERAL ELECTRIC'S  
RATE REVISION HAS BEEN  
CONSISTENT WITH THE  
METHODOLOGIES AND  
CALCULATIONS REQUIRED BY  
ORDER NO. 05-584 (UM 1443)

PACIFICORP'S PETITION TO  
INTERVENE

1 Pursuant to OAR 860-012-0001, PacifiCorp d/b/a Pacific Power ("PacifiCorp"),  
2 respectfully petitions to intervene in this proceeding. In support of this petition,  
3 PacifiCorp states as follows:

4 1. PacifiCorp is an electric utility in the state of Oregon and is subject to the  
5 jurisdiction of the Public Utility Commission of Oregon ("Commission").

6 2. The name and address of PacifiCorp are:

7 PacifiCorp  
8 825 NE Multnomah Street, Suite 2000  
9 Portland, Oregon 97232

10 Communications regarding this filing should be addressed to:

11 Oregon Dockets  
12 PacifiCorp  
13 825 NE Multnomah, Suite 2000  
14 Portland, OR 97232  
15 Telephone: (503) 813-5542  
16 oregondockets@pacificorp.com

Jordan A. White  
PacifiCorp  
825 NE Multnomah, Suite 1800  
Portland, OR 97232  
Telephone: (503) 813-5613  
jordan.white@pacificorp.com

17  
18 Jeff Lovinger  
19 Lovinger Kaufmann LLP  
20 825 NE Multnomah, Suite 925  
21 Portland, OR 97232  
22 Telephone: (503) 230-7120  
23 lovinger@klaw.com

1           3.     As a public utility subject to the jurisdiction of the Commission, PacifiCorp  
2 has an interest in this proceeding. Decisions and precedent established in this proceeding  
3 may directly impact PacifiCorp.

4           4.     No other party could adequately represent the interests of PacifiCorp.

5           5.     PacifiCorp will not unreasonably broaden the issues, burden the record,  
6 or unreasonably delay the proceeding.

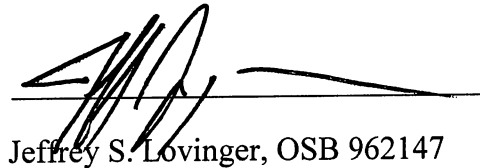
7           Based upon the foregoing, PacifiCorp respectfully requests the Commission grant  
8 this petition to intervene.

9           Additionally, PacifiCorp waives paper service in this proceeding.

DATED this 21st day of September, 2009.

Respectfully submitted,

By



Jeffrey S. Lovinger, OSB 962147  
Lovinger Kaufmann LLP  
Of Attorneys for PacifiCorp  
825 N.E. Multnomah, Suite 925  
Portland, Oregon 97232  
(503) 230-7715  
[lovinger@lklaw.com](mailto:lovinger@lklaw.com)

Jordan A. White, OSB 092270  
Senior Counsel  
PacifiCorp  
825 N.E. Multnomah, Suite 1800  
Portland, Oregon 97232  
(503) 813-5613  
[Jordan.White@PacifiCorp.com](mailto:Jordan.White@PacifiCorp.com)

CERTIFICATE OF SERVICE

I hereby certify that, on September 21, 2009, I served a true and correct copy of the foregoing *PacifiCorp's Answer and Affirmative Defenses* on the following named persons/entities by depositing a true copy thereof in the United States Mail at Portland, Oregon:

<p>MICHAEL T WEIRICH ASSISTANT ATTORNEY GENERAL REGULATED UTILITY &amp; BUSINESS SECTION DEPARTMENT OF JUSTICE 1162 COURT ST NE SALEM OR 97301-4096 <a href="mailto:michael.weirich@doj.state.or.us">michael.weirich@doj.state.or.us</a></p> <p>RICHARD GEORGE ATTORNEY PORTLAND GENERAL ELECTRIC 121 SW SALMON ST - 1WTC1711 PORTLAND OR 97204 <a href="mailto:richard.george@pgn.com">richard.george@pgn.com</a></p> <p>RANDALL DAHLGREN RATES &amp; REGULATORY AFFAIRS PORTLAND GENERAL ELECTRIC 121 SW SALMON ST - 1WTC1711 PORTLAND OR 97204 <a href="mailto:pge.opuc.filings@pgn.com">pge.opuc.filings@pgn.com</a></p>	<p>ED DURRENBERGER OREGON PUBLIC UTILITY COMMISSION PO BOX 2148 SALEM OR 97308-2148 <a href="mailto:ed.durrenberger@state.or.us">ed.durrenberger@state.or.us</a></p> <p>IRION A SANGER ASSOCIATE ATTORNEY DAVISON VAN CLEVE 333 SW TAYLOR - STE 400 PORTLAND OR 97204 <a href="mailto:ias@dvclaw.com">ias@dvclaw.com</a></p> <p>RANDALL J FALKENBERG RFI CONSULTING INC PMB 362 8343 ROSWELL RD SANDY SPRINGS GA 30350 <a href="mailto:consultrfi@aol.com">consultrfi@aol.com</a></p>
--	---

I hereby certified that, on September 21, 2009, I also served a true and correct copy of the foregoing *PacifiCorp's Answer and Affirmative Defenses* on the following named persons/entities by electronic mail:

<p>JANET L PREWITT (W) ASSISTANT ATTORNEY GENERAL NATURAL RESOURCES SECTION DEPARTMENT OF JUSTICE 1162 COURT ST NE SALEM OR 97301-4096 <a href="mailto:janet.prewitt@doj.state.or.us">janet.prewitt@doj.state.or.us</a></p>	<p>PAUL R WOODIN (W) COMMUNITY RENEWABLE ENERGY ASSOCIATION EXECUTIVE DIRECTOR 1113 KELLY AVE THE DALLES OR 97058 <a href="mailto:pwoodin@communityrenewables.org">pwoodin@communityrenewables.org</a></p>
---	--

VIJAY A SATYAL (W)  
SENIOR POLICY ANALYST  
OREGON DEPARTMENT OF ENERGY  
625 MARION ST NE  
SALEM OR 97301  
[vijay.a.satyal@state.or.us](mailto:vijay.a.satyal@state.or.us)

CAREL DEWINKEL (W)  
OREGON DEPARTMENT OF ENERGY  
625 MARION STREET NE  
SALEM OR 97301-3737  
[carel.dewinkel@state.or.us](mailto:carel.dewinkel@state.or.us)

TOM ELLIOTT (W)  
OREGON DEPARTMENT OF ENERGY  
628 MARION STREET NE  
SALEM OR 97301-3737  
[tom.elliott@state.or.us](mailto:tom.elliott@state.or.us)

PETER J RICHARDSON (W)  
RICHARDSON & O'LEARY PLLC  
PO BOX 7218  
BOISE ID 83707  
[peter@richardsonandoleary.com](mailto:peter@richardsonandoleary.com)



---

Jeffrey Lovinger  
Attorney for PacifiCorp