

BEFORE THE
PUBLIC UTILITY COMMISSION OF OREGON

In the Matter of)	DR 49
)	
GEORGIA-PACIFIC CONSUMER)	PETITION TO INTERVENE
PRODUCTS (CAMAS) LLC)	OF NOBLE AMERICAS ENERGY
)	SOLUTIONS LLC
and)	
)	
CLATSKANIE PEOPLE’S UTILITY)	
DISTRICT)	
)	
Petitioners.)	
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Noble Americas Energy Solutions LLC (“Noble Solutions”) hereby petitions the Public Utility Commission of Oregon (“OPUC” or “Commission”), pursuant to ORS 756.525 and OAR 860-001-0300, for leave to intervene herein and to appear and participate herein as a party. In support of its intervention, Noble Solutions states as follows:

1. The name and address of this Intervenor is:

Noble Americas Energy Solutions LLC
Attn: Greg Bass
401 West A Street, Suite 500
San Diego, California 92101
Telephone: (619) 684-8199
Fax: (619) 699-5027
gbass@noblesolutions.com

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2. Noble Solutions will be represented in this docket by:

Peter J. Richardson (OSB No. 06668)
Gregory M. Adams (OSB No. 101779)
Richardson Adams, PLLC
515 N. 27th Street
Boise, Idaho 83702
Telephone: (208) 938-2236
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peter@richardsonadams.com
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3. Copies of all filings, rulings, orders and other documents should be provided to the following:

Gregory M. Adams
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4. Noble Solutions is a national provider of retail energy services, including in the State of Oregon, and is a certified electricity service supplier (“ESS”) under Oregon law and administrative rules. Noble Solutions and its predecessor entity, Sempra Energy Solutions LLC, have actively participated in numerous recent proceedings related to retail direct access, including OPUC dockets UE 216, UE 227, UE 236, UE 245, UE 262, UE 264, UE 267, UE 287, UE 296, UM 1587, and UM 1690. Noble Solutions claims a direct and substantial interest in this proceeding because the petition for declaratory ruling in this case presents legal issues arising under Oregon’s retail direct access law, ORS 757.600 *et seq.* The issues presented could also implicate PacifiCorp’s direct access programs. As an active ESS in the State of Oregon, the

outcome of this proceeding is likely to affect Noble Solutions' ability to provide retail electricity services in the State of Oregon.

5. Pursuant to OAR 860-001-0300(4), Noble Solutions accepts: (a) the statement of facts as set forth in and for the purposes of the petition for declaratory ruling, and (b) the statement of the questions presented in the petition for declaratory ruling.

6. Noble Solutions, in its capacity as an active energy service supplier intends to participate herein as a party, and if necessary, to present comments, legal briefing, argument, and otherwise fully participate in these proceedings

7. Without the opportunity to intervene herein, Noble Solutions would be without any means of participation in this proceeding which may have a material impact on its business activities in the State of Oregon.

8. Granting this Intervenor's petition to intervene will not unduly broaden the issues, and nor will it unduly prejudice any party to this case.

WHEREFORE, Noble Americas Energy Solutions LLC respectfully requests that the Commission grant its Petition to Intervene in these proceedings and to appear and participate in all matters as may be necessary and appropriate, and to otherwise fully participate in these proceedings.

DATED this 8th day of May, 2015.

RICHARDSON ADAMS, PLLC

/s/ Gregory M. Adams

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Of Attorneys for Noble Americas Energy
Solutions LLC