

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1824

<p>In the Matter of</p> <p>The PUBLIC UTILITY COMMISSION OF OREGON,</p> <p>Investigation into PacifiCorp, dba PACIFIC POWER's Oregon-Specific Cost Allocation Issues.</p>	<p>PETITION TO INTERVENE OF IMPERIAL IRRIGATION DISTRICT (IID)</p>
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The Imperial Irrigation District (IID) petitions to intervene in this proceeding. In support of this petition, the following is provided:

1. The contact information (name, address, email address) of the petitioner is:

Name: Kevin E. Kelley
Company: Imperial Irrigation District
Street Address: 1824 W. Main Street
City, State, Zip: El Centro, CA 92243
Email Address: Through counsel- maguirre@amslawyers.com
Telephone: (760) 339-0621

Please include this contact on the service list.

- 2a. The petitioner will will not be represented by counsel in this proceeding. The contact information for petitioner's counsel to be included on the service list is:

Name: Michael J. Aguirre, Esq.
Company: Aguirre & Severson, LLP
Street Address: 501 West Broadway, Suite 1050
City, State, Zip: San Diego, CA 92101
Email Address: maguirre@amslawyers.com
Telephone: (619) 876-5364

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2b. Additional contacts to be included on the service list (a petitioner is limited to three contacts on the service list):

Name: Maria C. Severson, Esq.
Company: Aguirre & Severson, LLP
Street Address: 501 West Broadway, Suite 1050
City, State, Zip: San Diego, CA 92101
Email Address: mseverson@amslawyers.com
Telephone: (619) 876-5364

Name: Maria Byrnes
Company: Aguirre & Severson, LLP
Street Address: 501 West Broadway, Suite 1050
City, State, Zip: San Diego, CA 92101
Email Address: mbyrnes@amslawyers.com
Telephone: (619) 876-5364

3. If the petitioner is an organization, the number of members in and the purposes of the organization:

The Imperial Irrigation District (the District or IID) is a public entity organized in 1911 under the California Irrigation District Law (codified at Division 11 of the California Water Code) (the Law). The District has the power under law to, among other things, provide electric service within its geographic boundaries, an area of 1,658 square miles for water and 6,471 square miles for power. IID serves over 150,000 customers.

List of Members attached.

4. The nature and extent of the Petitioner's interest in the proceeding is:

IID has a substantial interest in the regional development of renewable electricity resources. IID has actively participated in related proceedings before the California Energy Commission. IID filed a petition to be a party in the California Public Utilities Commission proceeding that addresses issues related to those before the Oregon Public Utilities Commission in this proceeding.

5. The issues the Petitioner intends to raise at the proceeding are:

IID intends to address costs issues. IID also intends to address separation issues if they are raised, and changes to the 2017 protocol.

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6. The special knowledge or expertise of the Petitioner that would assist the Commission in resolving the issues in the proceeding is:

IID has extensive experience in the relevant issues, having operated as a public power utility since 1936.

7. Based on the information provided above in accordance with the Commission's rules of procedure, I request to participate in this proceeding as an intervenor. I, or the organization that I represent, will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding. OAR 860-001-0300.

Respectfully submitted this 22nd day of May, 2017.

/s/Michael J. Aguirre
Michael J. Aguirre, Esquire
Counsel for Petitioner Imperial Irrigation District