

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

Docket No. UM 1897

In the Matter of the Application of Hydro One Limited (acting through its indirect Subsidiary Olympus Equity LLC) for an Order Authorizing Hydro One Limited To Exercise Substantial Influence Over the Policies and Actions of Avista Corporation

PETITION TO INTERVENE

The Laborers' International Union of North America ("LiUNA"), its affiliated District Council, and Local Unions serving or located in Oregon ("Petitioner" or "District Council"), by and through Greg Held, its Oregon and Southern Idaho District Council of Laborers ("District Council") Business Manager, respectfully submits this Petition to Intervene and seeks party status in the above-reference proceeding pursuant to ORS § 756.525, OAR § 860-001-0300(2), and the Public Utility Commission's ("Commission") Notice of Prehearing Conference issued September 27, 2017. In support of this Petition to Intervene, the District Council states as follows:

1. The name and address of District Council as a party of record in this proceeding is:

Greg Held, Business Manager/Secretary-Treasurer
Oregon & Southern Idaho District Council of Laborers
17230 NE Sacramento St., Ste. 201
Portland, OR 97230
gheld@osidcl.org
Telephone: 503-760-2933

Charles D. Colett from the law firm of Colett Law Group, LLP, as well as David A. Rosenfeld and David W. M. Fujimoto from the law firm of Weinberg, Roger & Rosenfeld¹ will represent the District Council in this proceeding. In addition to Mr. Held, all documents related to this proceeding should be served on the District Council's attorneys at the following addresses:

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Laborers International
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2. Petitioner is a democratic labor organization that represents more than 2,600 members in the Oregon and Southern Idaho area who will be impacted by the outcome of this proceeding. Petitioner is an affiliate of LiUNA, which represents 500,000 members primarily employed in the construction industry, and is the eighth largest labor organization in the United States.

¹ Mr. Fujimoto will submit the appropriate documentation in order to appear pro hac vice before the Commission.

3. Hydro One Limited (“Hydro One”), acting through its indirect subsidiary Olympus Equity LLC, (“Applicant”) is requesting the Commission approve the merger of Hydro One and Avista Corporation (“Avista”).
4. Petitioner has a substantial interest in this proceeding because approximately 100 members of Petitioner have worked for construction contractors employed on Avista projects. Petitioner’s members have worked on Avista projects, in the state of Oregon, that are necessary for safe and reliable natural gas distribution to the public. Potential determinations in this proceeding may have a direct impact on Petitioner’s members, including but not limited to workforce development investments, training requirements, local employment impacts, and workplace safety. As some of Petitioner’s members are likely Avista consumers, their rates and natural gas service would potentially be affected by determination in this proceeding.
5. As the bargaining representative of certain contract employees of Avista, the District Council’s intervention serves the public interest as well as the interests of its members employed by certain Avista construction contractors. Petitioner and its members intend to provide relevant and necessary information related to the proceeding, including wage rates, training requirements, construction standards, local employment impacts, subcontracting, workforce development investments that may affect safe and reliable natural gas distribution services, and other matters relevant to determining whether granting the application is in the public interest. No other party can represent the interests of the District Council.

6. Petitioner and its signatory construction contractors have been parties to collective bargaining agreements with respect to pay, benefit packages, and employment conditions for certain construction workers employed on Avista projects. Petitioner has additional knowledge in construction standards, local employment impacts, subcontracting, workforce development, and maintaining an effective and well-trained workforce.
7. Based on the information provided above in accordance with the Commission's rules of procedure, the District Council requests to participate in this proceeding as an intervenor. The District Council will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding.

The District Council respectfully requests leave to intervene and requests all the rights of a party in this proceeding.

Dated this 4th day of October 2017.

Respectfully submitted,

/s/ Charles D. Collett
Charles D. Colett, OSB# 791916
Attorney for the District Council