

1 **BEFORE THE OREGON PUBLIC UTILITIES COMMISSION**

2
3 **UE 170**
4

5 **In the Matter of**

6
7 **PACIFIC POWER & LIGHT**
8 **COMPANY (dba PacifiCorp)**

9
10 **Request for a General Rate Increase**
11 **in the Company's Oregon Annual**
12 **Revenues**
13

PETITIONS FOR
INTERVENTION OF:

UTILITY REFORM PROJECT
AND NANCY NEWELL

14 1.
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16 Pursuant to ORS 756.525 and OAR 860-13-021, the Utility Reform Project
17 (URP) and Nancy Newell petition to intervene in this docket.

18 2.

19 URP is a non-profit corporation duly incorporated under the laws of Oregon.
20 Its mailing address is 10949 S.W. 4th Avenue, Portland, Oregon 97219. Among its
21 principal purposes is to represent its members and utility ratepayers generally in
22 proceedings before the Oregon Public Utility Commission (OPUC). The Project has
23 more than 30 members, several of whom are ratepayers of Pacific Power & Light
24 Company (PP&L).

25 3.

26 Nancy Newell is a PP&L ratepayer and has been for many years. She resides
27 at:

1 3917 NE Skidmore Street
2 Portland, OR 97211
3 503-288-3986 voice
4 ogec2@hotmail.com
5

6 Nancy Newell has investigated, written, and spoken on issues involving energy,
7 environmental protection, and corporate responsibility for almost 30 years.

8 4.

9 Petitioners herein are represented by:

10 Daniel W. Meek, Attorney
11 10949 S.W. 4th Avenue
12 Portland, OR 97219
13 (503) 293-9021 voice
14 (503) 293-9099 fax
15 dan@meek.net
16

5.

17 Petitioners intend to pursue in particular the issue of the federal, state, and/or
18 local income taxes that PP&L charges to Oregon ratepayer but in fact does not pay to
19 the federal, state, and/or local governments. Petitioners may pursue other issues
20 appropriate to a general rate case, without unreasonably broadening the issues or
21 burdening the record. Petitioners seek no alteration to the existing schedule of the
22 proceeding.

23 6.

24 To the extent allowed by the formality of the proceeding, each petitioner intends
25 to engage in some or all of the following actions:

26 a. receive and consider all filings;
27

- 1 b. offer public comment, when allowed;
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3 c. submit written testimony and exhibits;
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5 d. call witnesses;
6
7 e. cross-examine witnesses called by others;
8
9 f. file written arguments, briefs, memoranda and motions as directed by the
10 hearings officer or required by the course of proceedings.
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12 7.
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14 URP has participated in dozens of OPUC proceedings and more than a dozen
15 suits against OPUC final orders. Representatives of URP have been obtaining
16 information about the federal, state, and local income taxes being charged to
17 ratepayers but not being paid by the regulated energy utilities. They also participated
18 in the OPUC's "white paper" regarding utility taxation and rates and have testified at
19 the Oregon Legislature on this subject.

20 Dated: May 4, 2005

Respectfully Submitted,

21 _____
DANIEL W. MEEK
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CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing PETITIONS FOR INTERVENTION OF: UTILITY REFORM PROJECT AND NANCY NEWELL by mailing a copy properly addressed with first class postage, or by electronic mail pursuant to OAR 860-013-0070, to the following parties or attorneys of parties.

To every person on the service list UE 170 proceeding below for whom the list on the OPUC web site this day does not show an email address:

EDWARD BARTELL
KLAMATH OFF-PROJECT WATER USERS INC
30474 SPRAGUE RIVER ROAD
SPRAGUE RIVER OR 97639

DAN KEPPEL
KLAMATH WATER USERS ASSOCIATION
2455 PATTERSON STREET, SUITE 3
KLAMATH FALLS OR 97603

To every person on the service list UE 170 proceeding below for whom the list on the OPUC web site this day does show an email address:

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Dated: May 4, 2005

Daniel W. Meek