

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

In the Matter of the Petition of
Qwest Corporation
For Approval of Price Plan Pursuant to
ORS 759.255

PETITION TO INTERVENE

The League of Oregon Cities 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: Maja K. Haium
Company: League of Oregon Cities
Street Address: PO Box 928
City, State, Zip: Salem, OR 97308
Email Address: mhaium@orcities.org
Telephone: (503) 588-6550

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: See above
Company:
Street Address:
City, State, Zip:
Email Address:
Telephone:

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

Name: Sean O'Day
Company: League of Oregon Cities
Street Address: PO Box 928
City, State, Zip: Salem, OR 97308
Email Address: soday@orcities.org
Telephone: (503) 588-6550

Name:
Company:
Street Address:
City, State, Zip:
Email Address:
Telephone:

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

The League of Oregon Cities represents all 242 cities in the State of Oregon. The League is the effective and collective voice of Oregon's cities and their authoritative and best source of information and training.

List of Members attached

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

OAR 860-022-0042

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

Issues related to partial waiver of the rule cited above.

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

The League of Oregon Cities has consistently advocated on behalf of a city's right to receive compensation for the use of its right of ways.

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.

/s/ Maja K. Haium
Petitioner or Petitioner's Representative

1/29/2014
Date Signed

League of Oregon Cities Members

| | | | | |
|---------------|---------------|------------------|----------------|--------------|
| Adair Village | Dunes City | Klamath Falls | Portland | Veneta |
| Adams | Durham | La Grande | Powers | Vernonia |
| Adrian | Eagle Point | La Pine | Prairie City | Waldport |
| Albany | Echo | Lafayette | Prescott | Wallowa |
| Amity | Elgin | Lake Oswego | Prineville | Warrenton |
| Antelope | Elkton | Lakeside | Rainier | Wasco |
| Arlington | Enterprise | Lakeview | Redmond | Waterloo |
| Ashland | Estacada | Lebanon | Reedsport | West Linn |
| Astoria | Eugene | Lexington | Richland | Westfir |
| Athena | Fairview | Lincoln City | Riddle | Weston |
| Aumsville | Falls City | Lonerock | Rivergrove | Wheeler |
| Aurora | Florence | Long Creek | Rockaway Beach | Willamina |
| Baker City | Forest Grove | Lostine | Rogue River | Wilsonville |
| Bandon | Fossil | Lowell | Roseburg | Winston |
| Banks | Garibaldi | Lyons | Rufus | Wood Village |
| Barlow | Gaston | Madras | Salem | Woodburn |
| Bay City | Gates | Malin | Sandy | Yachats |
| Beaverton | Gearhart | Manzanita | Scappoose | Yamhill |
| Bend | Gervais | Maupin | Scio | Yoncalla |
| Boardman | Gladstone | Maywood Park | Scotts Mills | |
| Bonanza | Glendale | McMinnville | Seaside | |
| Brookings | Gold Beach | Medford | Seneca | |
| Brownsville | Gold Hill | Merril | Shady Cove | |
| Burns | Granite | Metolius | Shaniko | |
| Butte Falls | Grants Pass | Mill City | Sheridan | |
| Canby | Grass Valley | Millersburg | Sherwood | |
| Cannon Beach | Greenhorn | Milton-Freewater | Siletz | |
| Canyon City | Gresham | Milwaukie | Silverton | |
| Canyonville | Haines | Mitchell | Sisters | |
| Carlton | Halfway | Molalla | Sodaville | |
| Cascade Locks | Halsey | Monmouth | Spray | |
| Cave Junction | Happy Valley | Monroe | Springfield | |
| Central Point | Harrisburg | Monument | St Helens | |
| Chiloquin | Helix | Moro | St Paul | |
| Clatskanie | Heppner | Mosier | Stanfield | |
| Coburg | Hermiston | Mt Angel | Stayton | |
| Columbia City | Hillsboro | Mt Vernon | Sublimity | |
| Condon | Hines | Myrtle Creek | Summerville | |
| Coos Bay | Hood River | Myrtle Point | Sumpter | |
| Coquille | Hubbard | Nehalem | Sutherlin | |
| Cornelius | Huntington | Newberg | Sweet Home | |
| Corvallis | Idanha | Newport | Talent | |
| Cottage Grove | Imbler | North Bend | Tangent | |
| Cove | Independence | North Plains | The Dalles | |
| Creswell | Ione | North Powder | Tigard | |
| Culver | Irrigon | Nyssa | Tillamook | |
| Dallas | Island City | Oakland | Toledo | |
| Damascus | Jacksonville | Oakridge | Troutdale | |
| Dayton | Jefferson | Ontario | Tualatin | |
| Dayville | John Day | Oregon City | Turner | |
| Depoe Bay | Johnson City | Paisley | Ukiah | |
| Detroit | Jordan Valley | Pendleton | Umatilla | |
| Donald | Joseph | Philomath | Union | |
| Drain | Junction City | Phoenix | Unity | |
| Dufur | Keizer | Pilot Rock | Vale | |
| Dundee | King City | Port Orford | | |

CERTIFICATE OF SERVICE

UM 1354

I certify that I have, this day, served the foregoing document upon all parties of record in this proceeding by mailing a copy by electronic mail, pursuant to OAR 860-001-0180, to the following parties or attorneys of parties.

Dated this 29th day of January, 2014, at Salem, Oregon.

/s/ Maja K. Haium

Assistant General Counsel

League of Oregon Cities

PO Box 928

Salem, OR 97308

(503) 588-6550

UM 1354

SERVICE LIST (PARTIES)

| | |
|--|---|
| <p>Citizens' Utility Board of Oregon OPUC Dockets Robert Jenks G. Catronia McCracken</p> | <p>610 SW Broadway, Suite 400 Portland, OR 97205 dockets@oregoncub.org bob@oregoncub.org catronia@oregoncub.org</p> |
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| <p>Windstream Communications Inc. Bill Garcia</p> | <p>1800 Old Pecos Trl, Suite J Santa Fe, NM 87505 bill.garcia@windstream.com</p> |
| <p>Public Utility Commission of Oregon Bruce Hellebuyck</p> | <p>PO Box 1088 Salem, OR 97308 bruce.hellebuyck@state.or.us</p> |
| <p>PUC Staff – Oregon Department of Justice Jason W. Jones</p> | <p>Business Activities Section 1162 Court Street NE Salem, OR 97301 Jason.w.jones@state.or.us</p> |