

BEFORE THE
PUBLIC UTILITY COMMISSION OF OREGON

In the Matter of PORTLAND GENERAL)	UM 1662
ELECTRIC COMPANY and PACIFICORP dba)	
PACIFIC POWER, Request for Generic Power)	PETITION TO INTERVENE
Cost Adjustment Mechanism Investigation)	OF NOBLE AMERICAS ENERGY
)	SOLUTIONS LLC

Noble Americas Energy Solutions LLC (“Noble Solutions” hereby petitions the Public Utility Commission of Oregon (“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, and as grounds therefore 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

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

Peter J. Richardson (OSB No. 06668)
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3. Copies of all pleadings, production requests, production responses, Commission

orders and other documents should be provided to the following:

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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 regulations. *See* Order No. 10-453; Order No. 07-075; Order No. 02-133. Noble Solutions claims a direct and substantial interest in this proceeding because its ability to provide retail energy services in the State of Oregon, in the service territory of PacifiCorp, dba Pacific Power, and Portland General Electric Company will be affected by the outcome of this proceeding.

5. Noble Solutions, in its capacity as an active energy retail services provider intends to participate herein as a party, and if necessary, to introduce evidence, call and examine witnesses, and be heard in argument. The nature and quality of evidence which Noble Solutions will introduce is dependent upon the nature and effect of other evidence in this proceeding.

6. 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.

7. Granting Noble Solutions' intervention will not unduly broaden the issues, nor will it prejudice any party to this case.

WHEREFORE, Noble Americas Energy Solutions LLC respectfully requests that this 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 present evidence, call and examine witnesses, present argument and to otherwise fully participate in these proceedings.

DATED this 9th day of December, 2014.

RICHARDSON ADAMS, PLLC

/s/ Gregory M. Adams

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Of Attorneys for the Noble Americas
Energy Solutions LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 9th day of December, 2014, a true and correct copy of the within and foregoing **PETITION TO INTERVENE OF NOBLE AMERICAS ENERGY SOLUTIONS LLC, IN DOCKET UM 1662** was served as follows:

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Signed: */s/ Gregory M. Adams*

Gregory M. Adams