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Portland, Oregon 97232

July 23, 2018

***VIA ELECTRONIC FILING***

Public Utility Commission of Oregon  
201 High Street SE, Suite 100  
Salem, OR 97301-3398


Attn: Filing Center

**RE: UG 347—PacifiCorp's Petition to Intervene**

PacifiCorp d/b/a Pacific Power submits the enclosed petition to intervene in the above-referenced docket.

Please direct any questions on this filing to Natasha Siores, Manager, Regulatory Affairs, at (503) 813-6583.

Sincerely,



Etta Lockey  
Vice President, Regulation

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UG 347**

In the Matter of

CASCADE NATURAL GAS  
CORPORATION,

Request for a General Rate Revision.

**PACIFICORP PETITION TO  
INTERVENE**

PacifiCorp d/b/a Pacific Power respectfully petitions to intervene in these proceedings under ORS 756.525 and OAR 860-001-0300. In support of this petition, PacifiCorp states:

1. The contact information for PacifiCorp is:

PacifiCorp d/b/a Pacific Power  
825 NE Multnomah Street, Suite 2000  
Portland, OR 97232

2. The names and addresses of the persons to be included on the official service

list in this docket are:

Matthew D. McVee  
Chief Regulatory Counsel  
Pacific Power  
825 NE Multnomah Street, Suite 1800  
Portland, Oregon 97232  
PHONE: (503) 813-5585  
[matthew.mcvee@pacificcorp.com](mailto:matthew.mcvee@pacificcorp.com)

Oregon Dockets  
PacifiCorp  
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Portland, Oregon 97232  
[oregondockets@pacificcorp.com](mailto:oregondockets@pacificcorp.com)

3. PacifiCorp is an electric public utility in the state of Oregon and is subject to the jurisdiction of the Public Utility Commission of Oregon (Commission).

4. PacifiCorp is the co-owner of the Hermiston Generating Facility with the Hermiston Generating Company, LP. PacifiCorp owns 50 percent of the Hermiston Generating Facility and has dispatch rights to one of the two generating units at the facility.

PacifiCorp dispatches its share of the Hermiston Generating Facility to serve its retail electric customers.

5. Hermiston Generating Company, LP is party to Special Contract 902-2 with Cascade Natural Gas Corporation (Cascade), which Cascade refers to in the Direct Testimony of Ronald J. Amen. Hermiston Generating Company, LP has assigned PacifiCorp 50 percent of its rights to transportation under Special Contract 902-2. Accordingly, transportation service under Special Contract 902-2 provides the fuel supply for PacifiCorp's operation and dispatch of its share of the Hermiston Generation Facility to serve PacifiCorp's retail electric service customers in Oregon, and its system generally.

6. No other party can adequately represent the interests of PacifiCorp in this proceeding. Unlike Hermiston Generating Company, LP, which operates as a merchant independent power producer, PacifiCorp dispatches its share of the Hermiston Generating Facility to serve its retail electric customer load. Dispatch of the unit to serve retail electric load is, at times, subject to different constraints than a merchant independent power producer selling on the wholesale market under a strictly contractual arrangement.

7. This proceeding will have direct impact on PacifiCorp's Oregon retail electric customers through PacifiCorp's net power costs and the company has special knowledge and expertise that may assist the Commission in resolving the issues in the proceeding.

8. PacifiCorp, along with Hermiston Generating Company, LP, is participating in ongoing discussions with Cascade regarding transportation service to the Hermiston Generating Facility, and had hoped to resolve its issues without the need to intervene in the above-captioned proceeding. While PacifiCorp is still in discussions with Cascade regarding its issues, PacifiCorp now believes intervention is necessary to protect the company's

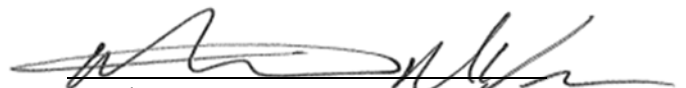
interests and the interests of its customers given the direction of the Administrative Law Judge in the July 10, 2018 Prehearing Conference Report requesting that parties seek intervention early in the proceeding. Cascade does not oppose PacifiCorp's late-filed intervention.

9. The issues PacifiCorp intends to raise in the proceeding include issues related to whether Cascade's proposals and rates reflected in and related to Special Contract 902-2 and Rate Schedule No. 163 are just and reasonable. PacifiCorp may raise additional issues related to Cascade's proposals following appropriate discovery and review of Commission policy.

10. Based on the information provided above in compliance with the Commission's rules of procedure, PacifiCorp requests to participate in these proceedings as an intervenor. PacifiCorp accepts the procedural schedule established in the July 10, 2018 Prehearing Conference Report and the company's participation in this docket will not unreasonably broaden the issues, burden the record, or delay the proceeding.

PacifiCorp respectfully requests that the Commission grant this petition to intervene.

Respectfully submitted this 23<sup>rd</sup> day of July, 2018,



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