1	BEFORE THE PUBLIC UTILITY COMMISSION			
2	OF OREGON			
3	DR 40			
4		DK 40		
5	In the Matter of the)		
6	HONEYWELL INTERNATIONAL,INC,)	PETITION TO INTERVENE OF	
7	AND HONEYWELL GLOBAL FINANCE, LLC,)	CITY OF MEDFORD	
8	and)		
9))		
10	PACIFICORP, dba PACIFIC POWER)		
11	Durguent to ODS 756 525 and OAD S	260 012 0001	the City of Medford (Medford)	
12	Pursuant to ORS 756.525 and OAR 860-012-0001, the City of Medford (Medford)			
13	petitions the Public Utility Commission of Oregon (Commission) to intervene in this proceeding			
14	with full party status as described in OAR § 860-011-0035(5). In support of this Petition,			
15	Medford represents as follows:			
16	1. The name and address of the petitioner is:			
17	City of Medford			
	411 W. 8th St.			
18	Medford, OR 97501 Phone number: (541)	774-2020		
19	2 Modford's authorized representati	vo and attorn	ey for purposes of these proceedings is	
20	2. Mediord's authorized representati	ve and autom	ey for purposes of these proceedings is	
21	Lori J. Cooper. All communications regarding these proceedings should be provided to			
22	Medford's authorized representative and atto	orney at the fo	ollowing addresses:	
23	Lori J. Cooper			
24	Attorney at Law			
25	411 W. 8th St. Medford, OR 97501			
26	-1-DR 40 Petition to Intervene			
27	City Attorney's Office 411 West 8th Street			
20	Medford, OR 97501 (541) 774-2020			

1	Phone number: (541) 774-2020 Fax number: (541) 774-2567		
2	Fax number: (541) 774-2567 E-mail address: <u>lori.cooper@cityofmedford.org</u>		
3	3. Medford is the largest city in southern Oregon, with a population of approximately		
5	75,000 people. Medford is a city existing, duly incorporated and organized under Oregon laws.		
6	4. Medford is in the process of granting third parties, such as solar power developers,		
7	rights to install a solar generating system on City-owned property. The generation output of this		
8	system will be sold to Medford to supply electric power for Medford's water treatment		
9	operations.		
10	5. Medford's participation in these proceedings will be in the public interest and will not		
11			
12	unreasonably broaden the issues, burden the record or delay the proceeding.		
13	Medford requests the Commission to grant this petition to intervene with full party status		
14	in this proceeding.		
15	DATED June 23, 2008.		
16			
17	Lori J. Cooper, OSB #91240		
18	411 W. 8th St.		
19	Medford, OR 97501 541-774-2020		
20	lori.cooper@cityofmedford.org		
21			
22			
23			
24			
25	-2-DR 40 Petition to Intervene		
26	City Attorney's Office 411 West 8th Street		
27	Medford, OR 97501 (541) 774-2020		

2	I certify that I have on this day served the	foregoing document upon all parties of record
3	in this proceeding via electronic mail:	
4	Michael T. Weirich, Esq.	Peter West
5	michael.weirich@doj.state.or.us	peter@energytrust.org
5	Department of Justice	Director of Renewable Energy
6	Reg Utility & Business Section	Energy Trust of Oregon, Inc.
	1162 Court Street N.E.	851 SW 6th Ave., Suite 1200
7	Salem, OR 97301-4096	Portland, OR 97204
8	Michelle R. Mishoe, Esq.	John M. Volkman, Esq.
9	michelle.mishoe@pacificorp.com	john.volkman@energytrust.org
9	Pacific Power & Light	General Counsel
10	825 NE Multnomah, Suite 1800	Energy Trust of Oregon, Inc.
	Portland, OR 97232	851 SW 6th Ave., Suite 1200
11		Portland, OR 97204
12	Theodore Falk, Esq.	,
12	theodore.falk@doj.state.or.us	Debbie Goldberg Menashe, Esq.
13	DOJ GC Transactions	debbie@energytrust.org
1.4	1162 Court Street, NE	Senior Counsel
14	Salem, OR 97301-4096	Energy Trust of Oregon, Inc.
15		851 SW 6th Ave., Suite 1200
	William F. Nessly, Jr., Esq.	Portland, OR 97204
16	william.nessly@state.or.us	
17	DOJ GC Transactions	Fritz Feiten
1 /	1162 Court St., NE	fritz.feiten@honeywell.com
18	Salem, OR 97301-4096	Honeywell Building Solutions
		9685 NE Beachcrest Drive
19	Lori Koho	Bainbridge Island, WA 98110
20	lori.koho@state.or.us	
20	OR Public Utility Commission	Kim T. Buckley, Esq.
21	PO Box 2148	buckley@eslerstephens.com
22	Salem, OR 97308	Esler Stephens & Buckley
		888 SW Fifth Ave., #700
23		Portland, OR 97204-2021
24		

CERTIFICATE OF SERVICE

27

25

26

-3-DR 40 Petition to Intervene

City Attorney's Office

411 West 8th Street Medford, OR 97501

(541) 774-2020

1

1	Joseph Reinhart	Oregon Department of Energy
2	joe@oseia.org	ATTN: Kip Pheil
	Executive Director	kip.pheil@state.or.us
3	OR Solar Energy Industries Assoc. 833 S.B. Main, MC #206	625 Marion St., NE Salem, OR 97310
4	Portland, OR 97214	Salelli, OK 97310
	Tordard, Ort 7/211	James L. Prewitt, Esq.
5	James Murphy	janet.preweitt@doj.state.or.us
6	james.b.murphy@doj.state.or.us	OR Department of Justice
	OR Department of Justice	Natural Resources Section
7	Natural Resources Section	1162 Court St., NE
8	1162 Court St., NE	Salem, OR 97301-4096
	Salem, OR 97301-4096	
9		
10	Dated: June 23, 2008.	
11		Lori J. Cooper, OSB #91240
12		411 W. 8th St.
12		Medford, OR 97501
13		Attorney for City of Medford
14		
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25	-4-DR 40 Petition to Intervene	
26	City Attorney's Office 411 West 8th Street	
	Medford, OR 97501	
27	(541) 774-2020	