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DEPARTMENT OF JUSTICE  
GENERAL COUNSEL DIVISION

December 11, 2014

Attention: Filing Center  
Public Utility Commission of Oregon  
2930 Fairview Industrial Drive SE  
PO Box 1088  
Salem, OR 97308-1088

Re: *In the Matter of PACIFICORP, dba PACIFIC POWER's 2015 Integrated Resource Plan*  
OPUC Docket No.: LC 62  
DOJ File No.: 340110-GN0356-13

Filing Center:

Enclosed for filing with the Commission today are an original and one copy of the Oregon Department of Environmental Quality's ("DEQ") Petition to Intervene in the above-captioned matter.

Sincerely,

Paul Garrahan  
Attorney-in-Charge  
Natural Resources Section

Enclosures  
PG1:jrs/#6059683  
c: LC 62 service list  
Colin McConnaha, DEQ

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

LC 62

In the Matter of )  
 )  
PACIFICORP, dba PACIFIC POWER ) PETITION TO INTERVENE  
 )  
2015 Integrated Resource Plan )  
 )

NAME OF PETITIONER: Oregon Department of Environmental Quality

ADDRESS: 811 SW Sixth Avenue, Portland, Oregon, 97204

PHONE NUMBER: (503) 229-5094

FAX NUMBER: (503) 229-6124

E-MAIL ADDRESSES: colin.mcconnaha@state.or.us

NAME OF COUNSEL FOR PETITIONER: Paul Garrahan, Attorney-in-Charge

COUNSEL'S ADDRESS: Department of Justice, Natural Resources Section 1162 Court  
Street N.E., Salem, Oregon, 97301-4096

COUNSEL'S PHONE NUMBER: (503) 947-4593

COUNSEL'S FAX NUMBER: (503) 378-3784

COUNSEL'S E-MAIL ADDRESS: paul.garrahan@doj.state.or.us

IF THE PETITIONER IS AN ORGANIZATION, THE NUMBER OF MEMBERS IN AND  
THE PURPOSES OF THE ORGANIZATION: Not applicable.

NATURE AND EXTENT OF THE PETITIONER'S INTEREST IN THE PROCEEDING:

Under ORS 468.035(c) and (f), the Oregon Department of Environmental Quality ("DEQ") is statutorily charged with advising, consulting and cooperating with other state agencies regarding "any proceedings and all matters pertaining to control of air ... pollution" and with providing "advisory technical consultation and services . . . to state agencies." And under ORS 468.045(1)(d), the DEQ Director is "authorized to participate in any proceeding before any public officer, commission or body of ... any state for the purposes of representing the citizens of Oregon concerning environmental quality." The U.S. Environmental Protection Agency has proposed new rules pursuant to Clean Air Act section 111(d) to reduce greenhouse gas emissions from existing power plants and DEQ will be the lead state agency in Oregon responsible for complying with such rules. As proposed, the rule contemplates that some compliance actions may involve actions by electric utilities, such as PacifiCorp, that are also subject to the jurisdiction of the Public Utility Commission. DEQ's interest in this docket is in coordinating its air quality responsibilities closely with the responsibilities of the PUC and PacifiCorp in the development of PacifiCorp's integrated resource plan.

ANY SPECIAL KNOWLEDGE OR EXPERTISE OF THE PETITIONER THAT WOULD ASSIST THE COMMISSION IN RESOLVING THE ISSUES IN THE PROCEEDING:

See description of the DEQ's interest, above.

NAMES, ELECTRONIC ADDRESSES, TELEPHONE NUMBERS AND PHYSICAL ADDRESSES OF THE REPRESENTATIVES THAT PETITIONER WOULD LIKE ADDED TO THE SERVICE LIST IN THIS DOCKET: Colin McConnaha, Oregon Department of Environmental Quality, colin.mcconnaha@state.or.us, (503) 229-5094, 811 SW Sixth Avenue, Portland, Oregon, 97204.

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 860-001-300

Petitioner hereby agrees to accept service by electronic mail and waives other forms of service.

Colin McConnaha  
Petitioner or Petitioner's Representative

12/11/14  
Date

## CERTIFICATE OF SERVICE

I hereby certify that on December 10, 2014, I served the foregoing PETITION TO INTERVENE upon the persons named on the service list, by electronic mail only as all parties have waived paper service.

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(C) = Confidential

DATED this 11<sup>th</sup> day of December 2014.

Paul Garrahan (9163707) for  
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Attorney-in-Charge  
Natural Resources Section