

***JIM DEASON***

ATTORNEY AT LAW

**Suite 107 | 521 SW Clay Street  
Portland, Oregon 97201**

**Telephone: (503) 223-4335  
Facsimile: (503) 226-1321**

**Mobile: (503) 502-3779  
email: [jimdeason@comcast.net](mailto:jimdeason@comcast.net)**

April 17, 2006

**VIA ELECTRONIC FILING AND FIRST CLASS MAIL**

Oregon Public Utility Commission  
Attention: Filing Center  
PO Box 2148  
Salem OR 97308-2148

Re: In the Matter of PACIFICORP, dba PACIFIC POWER AND LIGHT COMPANY  
Requests a general rate increase in the company's Oregon annual revenues of  
\$111,976,802, or 13.2 percent overall. OPUC Docket No. UE 179

Attention Filing Center:

Enclosed for filing in the above-captioned docket is the original and one (1) copy of  
League of Oregon Cities' Petition to Intervene. This document is being filed by electronic mail  
with the Filing Center.

If you have any questions, please call me at (503) 223-4335. Thank you for your  
assistance.

Very truly yours,

**/s/ Jim Deason**

Jim Deason

Encl.

cc: UE 179 Service List

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON  
UE 179**

In the Matter of

PACIFIC POWER & LIGHT  
(dba PacifiCorp)

Request for a General Rate Increase in LOC's  
Oregon Annual Revenues.

LEAGUE OF OREGON CITIES'  
PETITION TO INTERVENE

Pursuant to ORS § 756.525 and OAR 860-12-0001, the League of Oregon Cities ("LOC") hereby petitions the Public Utility Commission of Oregon ("Commission") to intervene with full party status in this proceeding. In support of this petition, LOC states:

1. The names and business address of LOC is:

League of Oregon Cities  
PO Box 928  
Salem, Oregon 97308  
Phone number: (503) 588-6550

2. Communications concerning this proceeding should be addressed to LOC's authorized representative for purposes of this proceeding:

Andrea Fogue  
League of Oregon Cities  
PO Box 928  
Salem, Oregon 97308  
Phone number: (503) 588-6550  
Fax number: (503) 399-4863  
E-mail address: afogue@orcities.org

3. The LOC will be represented in this proceeding by Jim Deason, Attorney at Law.

All documents relating to these proceedings should be served on the LOC's attorney at the following address:

Jim Deason, Attorney at Law  
521 SW Clay Street, Suite 107  
Portland, Oregon 97201-5407  
Telephone: 503-223-4335  
Facsimile: 503-226-1321  
E-mail address: jimdeason@comcast.net

4. The LOC is an intergovernmental entity whose membership is comprised of a voluntary association of two hundred forty (241) individually-incorporated municipalities located throughout Oregon. The LOC's membership includes all one hundred (100) cities that receive electric service from Pacific Power & Light dba PacifiCorp ("PacifiCorp"). Founded in 1925, the League provides a wide array of services to its member cities, ranging from education and training on topics relating to municipal operations to research and policy advocacy before administrative agencies and legislative bodies.

5. LOC has substantial interests in the outcome of this proceeding as it may substantially impact the rates paid by LOC's members for service from PacifiCorp. In this proceeding, PacifiCorp seeks approval of a number of revised tariffs pursuant to which LOC's members would purchase power. The proposed revisions include not only PacifiCorp's standard commercial and industrial cost-of-service and direct access tariffs, but also tariffs, such as those for service to street lights, which are predominantly if not exclusively used by LOC's members.

No other party can adequately represent LOC's interest or the collective interests of its member cities in this proceeding.

6. In addition to general rate impacts, this proceeding could impact other areas such as franchise rights where LOC generally participates as an advocacy body for its members. LOC requests the opportunity to be heard on these and other issues related to this filing, as such issues may arise during the course of this proceeding.

7. LOC's participation will be in the public interest and will not unreasonably broaden the issues, burden the record, or delay the proceeding. LOC has participated in many proceedings before the Public Utility Commission, including recent proceeding such as AR 394, AR 421, UE 115, UE 116, UE 118, UE 119, UM 1121 and UM 1209.

WHEREFORE, LOC respectfully requests that the Commission grant this petition to intervene.

DATED this 17<sup>th</sup> day of April, 2006.

/s/ **Jim Deason, #95497**

Jim Deason, OSB No. 95497  
521 SW Clay Street, Ste. 107  
Portland, OR 97201-5407  
(503) 223-4335  
jimdeason@comcast.net

Attorney for the League of Oregon Cities

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day caused the foregoing PETITION TO INTERVENE OF THE LEAGUE OF OREGON CITIES to be served by First Class US Mail, postage prepaid and properly addressed, and by electronic mail, upon each of the following parties:

**CITIZENS' UTILITY BOARD**  
LOWREY R BROWN  
610 SW BROADWAY - STE 308  
PORTLAND OR 97205  
[lowrey@oregoncub.org](mailto:lowrey@oregoncub.org)

JASON EISDORFER  
610 SW BROADWAY STE 308  
PORTLAND OR 97205  
[jason@oregoncub.org](mailto:jason@oregoncub.org)

**DEPARTMENT OF JUSTICE**  
JASON W JONES  
ASSISTANT ATTORNEY GENERAL  
DEPARTMENT OF JUSTICE  
1162 COURT ST NE  
SALEM OR 97301-4096  
[jason.w.jones@state.or.us](mailto:jason.w.jones@state.or.us)

MICHAEL T WEIRICH  
ASSISTANT ATTORNEY GENERAL  
DEPARTMENT OF JUSTICE  
REGULATED UTILITY & BUSINESS  
SECTION  
1162 COURT ST NE  
SALEM OR 97301-4096  
[michael.weirich@state.or.us](mailto:michael.weirich@state.or.us)

**BRUBAKER & ASSOCIATES, INC.**  
JAMES T SELECKY  
BRUBAKER & ASSOCIATES, INC.  
1215 FERN RIDGE PKWY, SUITE 208  
ST. LOUIS MO 63141  
[jtselecky@consultbai.com](mailto:jtselecky@consultbai.com)

**DAVISON VAN CLEVE PC**  
MELINDA J DAVISON  
IRION SANGER  
DAVISON VAN CLEVE PC  
333 SW TAYLOR - STE 400  
PORTLAND OR 97204  
[mail@dvclaw.com](mailto:mail@dvclaw.com)

**PACIFICORP**  
LAURA BEANE  
MANAGER, REGULATION  
PACIFICORP  
825 MULTNOMAH STE 800  
PORTLAND OR 97232-2153  
[laura.beane@pacificorp.com](mailto:laura.beane@pacificorp.com)

KATHERINE A MCDOWELL  
STOEL RIVES LLP  
900 SW FIFTH AVE STE 1600  
PORTLAND OR 97204-1268  
[kamcdowell@stoel.com](mailto:kamcdowell@stoel.com)

**BOEHM KURTZ & LOWRY**  
KURT J BOEHM, ATTORNEY  
MICHAEL L KURTZ, ATTORNEY  
36 E SEVENTH ST - STE 1510  
CINCINNATI OH 45202  
[kboehm@bkllawfirm.com](mailto:kboehm@bkllawfirm.com)

**COMMUNITY ACTION DIRECTORS  
OF OREGON**  
JIM ABRAHAMSON,  
COORDINATOR  
PO BOX 7964  
SALEM OR 97303-0208  
[jim@cado-oregon.org](mailto:jim@cado-oregon.org)

**OREGON ENERGY COORDINATORS  
ASSOCIATION**  
KARL HANS TANNER, PRESIDENT  
2448 W HARVARD BLVD  
ROSEBURG OR 97470  
[karl.tanner@ucancap.org](mailto:karl.tanner@ucancap.org)

**PORTLAND GENERAL ELECTRIC  
RATES & REGULATORY AFFAIRS**  
121 SW SALMON ST 1WTC0702  
PORTLAND OR 97204  
[pge.opuc.filings@pgn.com](mailto:pge.opuc.filings@pgn.com)

DOUGLAS C TINGEY  
121 SW SALMON 1WTC13  
PORTLAND OR 97204  
[doug.tingey@pgn.com](mailto:doug.tingey@pgn.com)

Dated at Portland, Oregon, this 17<sup>th</sup> day of April, 2006.

DATED this 17<sup>th</sup> day of April, 2006.

/s/ Jim Deason, #95497

Jim Deason

Attorney for the League of Oregon Cities