

Peter J. Richardson (OSB No. 06668)
Gregory M. Adams (OSB No. 101779)
Richardson & O’Leary PLLC
515 N. 27th Street
P.O. Box 7218
Boise, Idaho 83702
Telephone: (208) 938-2236
Fax: (208) 938-7904
peter@richardsonandoleary.com
greg@richardsonandoleary.com

Attorneys for the Noble Americas Energy Solutions, LLC

BEFORE THE
PUBLIC UTILITY COMMISSION OF OREGON

In the Matter of PACIFICORP, dba PACIFIC) UE 227
POWER 2012 Transition Adjustment)
Mechanism) PETITION TO INTERVENE
)
)
_____)

Noble Americas Energy Solutions, LLC 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

Copies of all pleadings, production requests, production responses, Commission orders and other documents should be provided to the following:

Peter J. Richardson
Greg Adams
Richardson & O’Leary, PLLC
515 N. 27th St
P.O. Box 7218
Boise, Idaho 83702
Telephone: (208) 938-2236
Fax: (208) 938-7904
peter@richardsonandoleary.com
greg@richardsonandoleary.com

Kevin Higgins
Energy Strategies, LLC
214 State Street, Suite 200
Salt Lake City, Utah 84111-2322
khiggins@energystrat.com

Greg Bass
Noble Americas Energy Solutions, LLC
401 West A Street, Suite 500
San Diego, California 92101
Telephone: (619) 684-8199
Fax: (619) 699-5027
gbass@noblesolutions.com

2. This Intervenor, Noble Americas Energy Solutions, LLC, 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. 10-453.¹ Noble Americas Energy Solutions, LLC, claims a direct and substantial interest in this proceeding in that its ability to provide retail energy services in the State of Oregon and more specifically within the service territory of PacifiCorp will be affected by the outcome of this proceeding.

3. This Intervenor, in its capacity as an active energy retail services provider intends

¹ On March 1, 2007, the Commission certified Sempra Energy Solutions LLC as an electricity service supplier. *See* Order 07-075. On November 2, 2010, Noble Americas Energy Solutions LLC filed a material change form with the Commission asking that it be granted scheduling ESS certification. This change was requested due to Noble Americas Energy Solutions LLC agreement to acquire Sempra Energy Solutions LLC. The Commission granted the requested change.

to participate herein as a party, and if necessary, to introduce evidence, cross-examine witnesses, call and examine witnesses, and be heard in argument. The nature and quality of evidence which this Intervenor will introduce is dependent upon the nature and effect of other evidence in this proceeding.

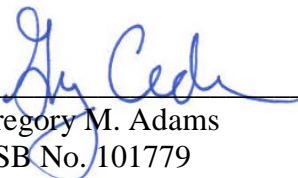
4. Without the opportunity to intervene herein, this Intervenor would be without any means of participation in this proceeding which may have a material impact on its business activities in the State of Oregon.

5. Granting this Intervenor's petition to intervene 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 12th day of April 2011.

RICHARDSON & O'LEARY, PLLC



Gregory M. Adams
OSB No. 101779
Attorneys for Noble Americas
Energy Solutions, LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 12th day of April, 2011, a true and correct copy of the within and foregoing **PETITION TO INTERVENE OF NOBLE AMERICAS ENERGY SOLUTIONS, LLC** was served as follows:

G. Catriona McCracken
CITIZEN’S UTILITY BOARD OF OREGON
catriona@oregoncub.org

Hand Delivery
 U.S. Mail, postage pre-paid
 Facsimile
 Electronic Mail

Gordon Feighner
Robert Jenks
CITIZEN’S UTILITY BOARD OF OREGON
Gordon@oregoncub.org
bob@oregoncub.org

Hand Delivery
 U.S. Mail, postage pre-paid
 Facsimile
 Electronic Mail

Katherine A. McDowell
McDOWELL RACKNER & GIBSON, P.C

Hand Delivery
 U.S. Mail, postage pre-paid
 Facsimile
 Electronic Mail

Jason W. Jones, Assistant AG
Department of Justice
1162 Court Street, NE
Salem OR 97301-4096
Jason.W.Jones@state.or.us

Hand Delivery
 U.S. Mail, postage pre-paid
 Facsimile
 Electronic Mail

Kelcey Brown
OREGON PUBLIC UTILITIES COMM.
PO Box 2148
Salem OR 97308-2148
kelcey.brown@state.or.us

Hand Delivery
 U.S. Mail, postage pre-paid
 Facsimile
 Electronic Mail

Irion A. Sanger
Davison Van Cleve
333 SW Taylor Ste 400
Portland OR 97204
ias@dvclaw.com

Hand Delivery
 U.S. Mail, postage pre-paid
 Facsimile
 Electronic Mail

Michael Early
Executive Director
INDUSTRIAL CUSTOMERS OF
NORTHWEST UTILITIES
1300 SW 5TH AVE, STE 1750
Portland, OR 97204-2446
mearly@icnu.org

Hand Delivery
 U.S. Mail, postage pre-paid
 Facsimile
 Electronic Mail

Joelle Steward
Pacific Power & Light
joelle.steward@pacificorp.com

Hand Delivery
 U.S. Mail, postage pre-paid
 Facsimile
 Electronic Mail

Jordan A White
Pacific Power & Light
jordan.white@pacificorp.com

Hand Delivery
 U.S. Mail, postage pre-paid
 Facsimile
 Electronic Mail

PacifiCorp, dba Pacific Power
Oregon Dockets
oregondockets@pacificorp.co


Hand Delivery
 U.S. Mail, postage pre-paid
 Facsimile
 Electronic Mail

Donald W Schoenbeck
dws@r-c-s-inc.com

Hand Delivery
 U.S. Mail, postage pre-paid
 Facsimile
 Electronic Mail

Kevin Higgins
Energy Strategies LLC
khiggins@energystrat.com

Hand Delivery
 U.S. Mail, postage pre-paid
 Facsimile
 Electronic Mail

Signed 
Gregory M. Adams