## **BEFORE THE**

## PUBLIC UTILITY COMMISSION OF OREGON

In the Matter of ) Portland General Electric Company: Request for ) General Rate Revision )

UE 262

PETITION TO INTERVENE AND WAIVER OF PAPER SERVICE

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

2. This Intervenor, Noble Americas Energy Solutions LLC, will be represented in

this docket by:

Peter J. Richardson (OSB No. 06668) Gregory M. Adams (OSB No. 101779) Richardson & O'Leary PLLC 515 N. 27<sup>th</sup> Street P.O. Box 7218 Boise, Idaho 83702 Telephone: (208) 938-2236 Fax: (208) 938-7904 peter@richardsonandoleary.com greg@richardsonandoleary.com 3. Copies of all pleadings, production requests, production responses, Commission orders and other documents should be provided to the following:

Gregory M. Adams (**W**) Richardson & O'Leary, PLLC 515 N. 27<sup>th</sup> St. Boise, Idaho 83702 Telephone: (208) 938-2236 Fax: (208) 938-7904 greg@richardsonandoleary.com

Kevin C. Higgins (**W**) Principal Energy Strategies, LLC 215 South State Street, Suite 200 Salt Lake City, Utah 84111 Telephone: (801) 355-4365 Fax: (801) 521-9142 <u>KHiggins@Energystrat.com</u> Greg Bass (**W**) 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

4. 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; Order No. 07-075. Noble Americas Energy Solutions LLC, claims a direct and substantial interest in this proceeding because its ability to provide retail energy services in the State of Oregon, and more specifically in the service territory of Portland General Electric Company, will be affected by the outcome of this proceeding.

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

6. 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.

7. Granting this Intervenor's petition to intervene will not unduly broaden the issues nor will it prejudice any party to this case.

8. Noble Americas Energy Solutions LLC hereby waives paper service in 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 21st day of February, 2013.

## RICHARDSON & O'LEARY, PLLC

/s/ Gregory M. Adams

Peter J. Richardson (OSB No. 06668) Gregory M. Adams (OSB No. 101779) Richardson & O'Leary PLLC 515 N. 27<sup>th</sup> 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

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 21<sup>st</sup> day of February, 2013, a true and correct copy of the within and foregoing **PETITION TO INTERVENE OF NOBLE AMERICAS ENERGY SOLUTIONS LLC, IN DOCKET UE 262** was served as follows:

G Catriona McCracken Hand Delivery Robert Jenks U.S. Mail, postage pre-paid CITIZEN'S UTILITY BOARD OF OREGON Facsimile X Electronic Mail catriona@oregoncub.org bob@oregoncub.org dockets@oregoncub.org Stephanie S Andrus Hand Delivery \_\_\_\_U.S. Mail, postage pre-paid PUC Staff - Department of Justice 1162 Court Street. NE Facsimile Salem OR 97301-4096 X Electronic Mail stephanie.andrus@doj.state.or.us Judy Johnson \_\_ Hand Delivery OREGON PUBLIC UTILITIES COMM. U.S. Mail, postage pre-paid PO Box 2148 Facsimile Salem OR 97308-2148 X Electronic Mail judy.johnson@state.or.us S Bradley Van Cleve Davison Van Cleve \_ Hand Delivery \_\_\_U.S. Mail, postage pre-paid 333 SW Taylor Ste 400 Portland OR 97204 Facsimile X Electronic Mail bvc@dvclaw.com Johanna Riemenschneider Hand Delivery PUC Staff – Department of Justice \_\_\_U.S. Mail, postage pre-paid Facsimile 1162 Court St NE Salem OR 97301 X Electronic Mail johanna.riemenschneider@doj.state.or.us Regulatory & Cogeneration Services Inc Donald W Schoenbeck Hand Delivery 900 Washington St Ste780 U.S. Mail, postage pre-paid Vancouver WA 98660-3455 Facsimile

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Portland General Electric Jay Tinker 121 SW Salmon St – 1WTC0702 Portland OR 97204 pge.opuc.filines@pgn.com

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Mark R Thompson Northwest Natural 220 NW 2<sup>nd</sup> Ave Portland OR 97209 <u>efiling@nwnatural.com</u> mark.thompson@nwnatural.com

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Signed:

Gregory M. Adams