

BEFORE THE
PUBLIC UTILITY COMMISSION OF OREGON

In the Matter of)	UE 264
)	
PacifiCorp dba Pacific Power: 2014 Transition)	PETITION TO INTERVENE
Adjustment Mechanism)	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. 27th 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. 27th 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
KHiggins@Energystrat.com

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 PacifiCorp, dba Pacific Power, 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, 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 5th day of March, 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. 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

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 5th day of March, 2013, a true and correct copy of the within and foregoing **PETITION TO INTERVENE AND WAIVER OF PAPER SERVICE OF NOBLE AMERICAS ENERGY SOLUTIONS LLC**, was served as shown:

Katherine A McDowell
McDowell Rackner & Gibson PC
419 SW 11th Ave Ste 400
Portland OR 97205
katherine@mcd-law.com

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

John Crider (C)
PUBLIC UTILITY COMMISSION OF OREGON
PO Box 2148
Salem OR 97308-2148
john.crider@state.or.us

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

Sarah Wallace
Pacific Power
825 NE Multnomah St Ste 1800
Portland OR 97232
sarah.wallace@pacificorp.com

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

PacifiCorp dba Pacific Power
825 NE Multnomah St Ste 2000
Portland OR 97232
oregondockets@pacificorp.com

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

PUC STAFF-DEPARTMENT OF JUSTICE
Jason W. Jones (C)
1162 Court St NE
Salem OR 97301
jason.w.jones@state.or.us

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

By /s/ Gregory M. Adams

Gregory M. Adams