# **BEFORE THE**

# PUBLIC UTILITY COMMISSION OF OREGON

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In the Matter of

UE 287

PacifiCorp dba Pacific Power: 2015 Transition Adjustment Mechanism 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 Adams PLLC 515 N. 27<sup>th</sup> Street 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 Adams, 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 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; Order No. 02-133. 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 7th day of April, 2014.

# RICHARDSON ADAMS, PLLC

/s/ Gregory M. Adams

Peter J. Richardson (OSB No. 06668) Gregory M. Adams (OSB No. 101779) Richardson Adams PLLC 515 N. 27<sup>th</sup> Street Boise, Idaho 83702 Telephone: (208) 938-2236 Fax: (208) 938-7904 peter@richardsonadams.com greg@richardsonadams.com

Of Attorneys for the Noble Americas Energy Solutions LLC

### **CERTIFICATE OF SERVICE**

#### I HEREBY CERTIFY that on the 7th day of April, 2014, 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 11<sup>th</sup> Ave Ste 400 Portland OR 97205 katherine@mcd-law.com

Jorge Ordonez PUBLIC UTILITY COMMISSION OF OREGON PO Box 1088 Salem OR 97308-1088 jorge.ordonez@state.or.us

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

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

PUC STAFF-DEPARTMENT OF JUSTICE Michael T Weirich 1162 Court St NE Salem OR 97301 <u>michael.weirich@state.or.us</u>

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- \_\_\_\_ Facsimile
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X Electronic Mail

By /s/ Gregory M. Adams

Gregory M Adams