

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 428

In the Matter of

PACIFICORP, dba PACIFIC POWER,

Advice No. 23-018 (ADV 1545),
Modifications to Rule 4, Application for
Electrical Service.

**PETITION TO INTERVENE OF FRERES
TIMBER, INC.**

Freres Timber, Inc. and Freres Lumber Co., Inc. (collectively “Freres”) respectfully petitions the Oregon Public Utility Commission (“PUC”) to intervene in this proceeding in accordance with OAR 860-001-0300 and ORS 756.525. In support of this petition, Freres provides the following:

- a) The name and business address of the Company are:

Name: Freres Timber, Inc.
Address: 141 14th Street
Lyons, OR 97358

Please contact through Counsel:

Haglund Kelley LLP
Attn: Michael E. Haglund
2177 SW Broadway
Portland OR 97201

- b) The petitioner will be represented by counsel in this proceeding:

Michael E. Haglund, OSB No. 772030
Mathew E. Malmshemer, OSB No. 033847
Ben Deford, OSB No. 233089
Haglund Kelley LLP
2177 SW Broadway
Portland, OR 97201
Phone: 503.225.0777
mhaglund@hk-law.com
mmalmshemer@hk-law.com
bdeford@hk-law.com

c) Freres also requests the following be included on the official service list in this proceeding:

d) Freres is a wood products manufacturing firm with deep roots in Oregon. It was started over one hundred years ago in the Santiam canyon and has always worked to innovate and advance the manufacture of the wood products necessary to build our state and our nation, from the early days of plywood to today's Mass Ply Panels. Freres owns tens of thousands of acres of timber land in Oregon and operates five manufacturing plants and a cogeneration facility that provide family wage jobs to Oregonians who work directly for Freres. Decisions made and precedent established in this proceeding will directly affect Freres. Freres thus has a direct and substantial interest in the issues raised in this proceeding.

e) Freres has special knowledge and expertise that may assist the Commission in resolving the issues in the proceeding, including owning, managing and operating extensive tracts of timberland and manufacturing facilities that are potentially at risk from utility caused wildfires. Freres has already experienced significant losses as the result of PacifiCorp's gross negligence in starting the Santiam Canyon fire on Labor Day 2020, and the proposed modifications to PacifiCorp's tariff could, if enacted, significantly and negatively impact Freres's interests.

f) Freres intends to monitor and participate in the proceeding by presenting arguments and raising issues from its unique perspective. No other party or entity could adequately represent Freres's interests in this proceeding.

g) Based on the information provided above in compliance with the Commission's rules of procedures, Freres requests approval to participate in these proceedings as an intervenor. Freres's participation in this docket will not unreasonably broaden the issues, burden the record, or unreasonably delay this proceeding.

Freres therefore respectfully requests that the Commission grant this petition to intervene.

DATED this 16th day of February, 2024.

Respectfully submitted,

/s/ Michael E. Haglund

Michael E. Haglund, OSB No. 772030

Haglund Kelley LLP

2177 SW Broadway

Portland, OR 97201

(503) 225-0777

mhaglund@hk-law.com