

BEFORE THE  
PUBLIC UTILITY COMMISSION OF OREGON

In the Matter of PACIFICORP	)	UM 1050
	)	
Request to Initiate an Investigation of Multi- Jurisdictional Issues and Approve an Inter- Jurisdictional Cost Allocation Protocol.	)	PETITION TO INTERVENE OF NOBLE AMERICAS ENERGY SOLUTIONS LLC

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Noble Americas Energy Solutions LLC (“Noble Solutions”) 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](mailto:gbass@noblesolutions.com)

2. Noble Solutions will be represented in this docket by:

Gregory M. Adams (OSB No. 101779)  
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515 N. 27<sup>th</sup> Street  
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3. Copies of all pleadings, production requests, production responses, Commission

orders and other documents should be provided to the following:

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4. Noble Solutions 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.

5. Noble Solutions claims a direct and substantial interest in this proceeding because the 2017 Inter-Jurisdictional Allocation Protocol contains provisions addressing retail direct access programs and other traditional cost-of-service alternatives available in Oregon and other states. The 2017 Protocol may impact implementation of Oregon’s retail direct access laws, and it may impact whether direct access service to Oregon customers is placed at a disadvantage relative to other service alternatives. Noble Solutions’ ability to provide retail energy services to PacifiCorp’s customers will therefore be affected by the outcome of this proceeding.

6. Noble Solutions has been an active participant in several Commission dockets

that affect the Commission's implementation of Oregon's retail direct access law, and Noble Solutions possesses unique knowledge and expertise that will assist the Commission in evaluating the potential impact of the 2017 Protocol on Oregon's retail direct access programs.

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

8. Without the opportunity to intervene herein, Noble Solutions 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.

**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 3rd day of March, 2016.

RICHARDSON ADAMS, PLLC



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Of Attorneys for Noble Americas Energy Solutions LLC