

February 27, 2007

***VIA ELECTRONIC FILING
AND OVERNIGHT DELIVERY***

Oregon Public Utility Commission
550 Capitol Street NE, Ste 215
Salem, OR 97301-2551

Attention: Vikie Bailey-Goggins, Administrator
Regulatory and Technical Support

RE: Public Utility Commission of Oregon Staff's Investigation into the Treatment of
CO2 Risk in the Integrated Resource Plan (IRP) Process in Docket No. UM-1302.

PacifiCorp (dba Pacific Power & Light Company) submits for filing an original and five
copies of a Petition to Intervene in the above mentioned proceeding.

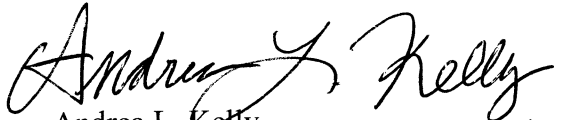

It is respectfully requested that all formal correspondence and Staff requests regarding
this filing be addressed to the following:

By E-mail (preferred): datarequest@pacificorp.com

By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah, Suite 2000
Portland, OR 97232

Informal inquiries may be directed to Laura Beane, Regulatory Manager at (503) 813-
5542.

Sincerely,


Andrea L. Kelly
Vice President, Regulation 

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1302

In the Matter of:)	
PUBLIC UTILITY COMMISSION)	
OF OREGON Staff's Investigation)	Petition to Intervene of PacifiCorp
Into the Treatment of CO ₂ Risk in the)	
Integrated Resource Plan (IRP) Process)	
)	

Pursuant to ORS 756.525 and OAR 860-012-0001, PacifiCorp respectfully petitions to intervene in this proceeding. In support of this petition, PacifiCorp states:

1. PacifiCorp is an electric public utility in the state of Oregon and is subject to the jurisdiction of the Public Utility Commission of Oregon (“Commission”).
2. The name and address of PacifiCorp are:

PacifiCorp
825 NE Multnomah Street
Portland, OR 97232

Communications concerning this proceeding should be addressed to:

PacifiCorp Oregon Dockets
825 NE Multnomah Street, Ste 2000
Portland, OR 97232
OregonDockets@pacificorp.com

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PacifiCorp
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PacifiCorp Regulatory Operations
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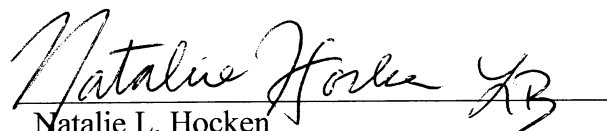
3. PacifiCorp has a direct and substantial interest in this proceeding. OAR 860-038-0080 requires PacifiCorp to file Integrated Resource Plans (“IRP”) every two years. This investigation could affect the analysis of PacifiCorp’s resources and shape the outcome of an IRP and PacifiCorp’s responsibilities regarding the IRP.

4. PacifiCorp has experience with IRPs and Commission investigations. PacifiCorp’s participation in this docket could assist the Commission in resolving the issues. PacifiCorp will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceedings.

5. Because of PacifiCorp’s direct and substantial interest mentioned above, no other party can adequately represent PacifiCorp’s interests in this proceeding.

WHEREFORE, PacifiCorp respectfully requests that the Commission grant this petition to intervene.

DATED: February 27, 2007.



Natalie L. Hocken
Vice President and General Counsel,
Pacific Power

Counsel for PacifiCorp

I hereby certify that on this 1st day of March, 2007, I caused to be served, via E-Mail (if address available), and U.S. mail, a true and correct copy of PacifiCorp's Petition to Intervene in the Docket No. UM-1302 to the following:

<p>Irion A. Sanger Melinda J. Davison DAVISON VAN CLEVE 333 SW Taylor Suite 400 Portland, OR 97204 ias@dvclaw.com mail@dvclaw.com</p>	<p>Janet Prewitt DEPARTMENT OF JUSTICE 1162 Court Street NE Salem, OR 97301-4096 Janet.prewitt@dogj.state.or.us</p>
<p>Lowrey R. Brown (Paper Copy Waived) Jason Eisdorfer Robert Jenks CITIZENS' UTILITY BOARD OF OREGON 610 SW Broadway Ste 308 Portland, OR 97205 lowrey@oregoncub.org Jason@oregoncub.org bob@oregoncub.org</p>	<p>Philip H. Carver OREGON DEPARTMENT OF ENERGY 625 Marion St. NE Ste 1 Salem, OR 97301-3742 Philip.h.carver@state.or.us</p>
<p>Maury Galbraith OREGON PUBLIC UTILITY COMMISSION P.O. Box 2148 Salem, OR 97308-2148 maury.galbraith@state.or.us</p>	<p>Michelle R. Mishoe PACIFIC POWER & LIGHT 825 NE Multnomah Ste 1800 Portland, OR 97232 michelle.mishoe@pacificorp.com</p>



Peggy Ryan
Supervisor, Regulatory Administration