

**BEFORE THE WASHINGTON STATE
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND)	DOCKET NO. UE-111190
TRANSPORTATION COMMISSION)	
)	
Complainant,)	PETITION TO INTERVENE
)	OF THE ENERGY PROJECT
v.)	
)	
PACIFICORP d/b/a/ PACIFIC POWER &)	
LIGHT COMPANY)	
)	
Respondent.)	
.....)	

COMES NOW, Petitioner The Energy Project, by and through its undersigned legal counsel, and pursuant to WAC 480-07-355, respectfully petitions for the right to intervene as a party to the above-captioned proceeding, with all rights and responsibilities appurtenant thereto as described in WAC 480-07-340.

Pursuant to WAC 480-07-355, Petitioner offers the following information:

- (i) The Petitioner’s name and address is

The Energy Project
Opportunity Council
3406 Redwood Ave.
Bellingham, WA, 98225

The Energy Project will be represented in this matter by Brad M. Purdy. All documents pertaining to this proceeding should be sent to:

Brad M. Purdy
Attorney at Law
2019 N. 17th St.
Boise, ID 83702
208-384-1299 (Land)
208-484-9980 (Cell)
208-384-8511 (Fax)
bmpurdy@hotmail.com

- (ii) The administrative rules at issue are WAC Sections 480-07-340 through 355.
- (iii) The Energy Project, a division of the Opportunity Council, a non-profit organization, advocates statewide on behalf of community action agencies for programs that help to provide affordable access to essential home energy services for low-income households. Among others, The Energy Project represents the interests of The Opportunities Industrialization Center of Washington (“OIC”), a community action agency located at 815 Fruitdale Blvd., Yakima, WA, 98902-1467. OIC, and the low-income individuals it assists, are located in Pacific Power and Light’s service territory. OIC has unique knowledge and experience pertinent to this proceeding by providing services to low-income households. The Energy Project has previously intervened in numerous other proceedings before this Commission, including Pacific Power and Light rate cases. The Energy Project is a partner between the Washington State Community Action Partnership and the Washington Department of Community, Trade and Economic Development.

For the reasons listed above, the intervention of The Energy Project in this proceeding is in the public interest. The Energy Project requests that the Commission grant its petition to intervene in this matter.

- (iv) Though Petitioner has not yet had ample opportunity to fully assess all matters in controversy and formulate a precise position on such matters, Petitioner generally takes the position that the rate increase will have a profound impact, particularly in these dire economic times, on all of Pacific Power and Light’s residential customers, including those who are considered “low-income.” The result will be to increase the number of households unable to afford electricity service, reduce the relative number of households that agencies providing assistance (including, *inter alia*, weatherization measures) to PacifiCorp customers will be able to assist, and reduce the effectiveness of the programs such agencies offer to lower energy bills.

As a result, The Energy Project has a direct and substantial interest in this proceeding, will assist the Commission in resolving the issues and will not unduly broaden the issues or delay the proceeding.

(v) WHEREFORE, The Energy Project respectfully petitions the Commission for leave to intervene in this proceeding.

DATED, this ____ day of August, 2011.

Brad M. Purdy
Attorney for Petitioner

CERTIFICATE OF SERVICE

I hereby certify that on this ____ day of August, 2011, I caused to be served the foregoing document upon the following via email and first class postage, U.S.

DATED this ____ day of August, 2011.

Brad M. Purdy

Andrea L. Kelly
PacifiCorp
825 NE Multnomah, Suite 2000
Portland, OR 97232
andrea.kelly@pacificorp.com

Katherine A. McDowell
McDowell & Rackner
419 S.W. 11th Ave, Suite 400
Portland, OR 97205
katherine@mcd-law.com

Gregory J. Trautman
Assistant Attorney General
1400 S. Evergreen Park Dr. S.W.
P.O. Box 40128
Olympia, WA 98504-0128
gtrautma@utc.wa.gov

Natalie Hocken
PacifiCorp
825 NE Multnomah St., Suite 2000
Portland, OR 97232-2135
natalie.hocken@pacificorp.com

Sarah A. Shifley
Assistant Attorney General
Public Counsel Section
800 Fifth Avenue, Suite 2000
Seattle, WA 98104-3188
sarah.shifley@atg.wa.gov