



NATURAL RESOURCES DEFENSE COUNCIL

June 1, 2005

Carole Washburn  
Executive Secretary  
WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION  
1300 So. Evergreen Park Drive SW  
P.O. Box 47250  
Olympia, WA 98504-7250

Re: Docket No. UE-050684

Dear Ms. Washburn:

Attached for filing with the Commission please find an original plus fourteen (14) copies of the **Natural Resources Defense Council's Petition to Intervene** in the above referenced proceeding. I have e-mailed a copy of the Petition to Intervene to the Records Department. As Ralph Cavanagh has informed Administrative Law Judge Theodora Mace, NRDC will be participating in the June 6<sup>th</sup> Prehearing Conference via phone. Thank you for your assistance.

Sincerely,

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Shari Walker  
Energy Program Assistant  
Natural Resources Defense Council

Encl.  
cc: all parties

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

Washington Utilities and Transportation Commission,	)	
	)	
Complainant,	)	<b>Docket NO. UE-050684</b>
	)	
v.	)	
	)	
PACIFICORP d/b/a PACIFIC	)	
POWER AND LIGHT COMPANY	)	
	)	
Respondent.	)	
	)	
.....	)	

**PETITION TO INTERVENE**

The Natural Resources Defense Council (NRDC) hereby requests permission to intervene in the above referenced proceeding. In support of this Petition to Intervene, NRDC asserts the following:

A. NRDC's business address is:

Natural Resources Defense Council  
111 Sutter Street, 20<sup>th</sup> Floor  
San Francisco, CA 94104

B. NRDC will be represented in this matter by Ralph Cavanagh, Northwest Project Director. Ralph Cavanagh, NRDC is designated for service of all documents in this matter at the address of the organizational office provided above.

C. NRDC is a non-profit organization under section 501(c)(3) of the Internal Revenue Code. NRDC has more than 24,000 individual members in Washington, many of whom are PacifiCorp customers. NRDC is dedicated to protecting natural resources and ensuring a safe and healthy environment. The organization has maintained a Northwest Energy Project since 1979 and has appeared frequently before the WUTC to assert its members' interest in a sustainable and affordable long-term energy future for the region, including but not limited to accelerated development of cost-effective energy efficiency and renewable resources.

D. NRDC has a special interest in this proceeding for the following reasons: (1) rate design or cost recovery modifications that occur as a result of this proceeding may affect PacifiCorp's and customers' investment in energy efficiency; (2) decisions made in this proceeding may influence PacifiCorp's investments in energy conservation, renewable resources, and low-income energy

services; and (3) decisions made regarding this proceeding may set a precedent for decision-making in future electric and gas rate cases.

E. NRDC intends to examine various issues in this proceeding, including but not limited to incentives for investments in energy efficiency, renewable energy and low-income energy services, and electric resource portfolio management more generally. NRDC notes that PacifiCorp has expressed strong interest in removing financial disincentives to promoting energy efficiency investments throughout its service territory. NRDC intends to offer specific proposals for the Commission's consideration that will meet this objective and secure more cost-effective electricity savings for the Company and its customers.

F. NRDC offers this process considerable expertise in the area of resource planning, industry structure and incentives, and economic and policy analysis. NRDC has participated in numerous rate cases, mergers, and resource planning proceedings in Oregon, Washington, Idaho, and Montana.

G. NRDC has no intention of unreasonably broadening the issues, burdening the record or delaying the proceeding through its intervention.

For the foregoing reasons, NRDC requests the Commission grant its motion to intervene in this matter.

June 1, 2005

Respectfully submitted,

A handwritten signature in black ink that reads "Ralph Cavanagh". The signature is written in a cursive, flowing style.

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Ralph Cavanagh  
Northwest Project Director  
111 Sutter Street, 20<sup>th</sup> Floor  
San Francisco, CA 94104

CERTIFICATE OF SERVICE

I hereby certify that on this day, June 1, 2005, I have served a copy of the foregoing Petition to Intervene of the Natural Resources Defense Council by first class, U.S. Mail on the following persons:

Complainant:

Washington Utilities and  
Transportation Commission  
Chandler Plaza Building  
1300 S. Evergreen Park Drive S.W.  
P.O. Box 47250  
Olympia, WA 98504-7250  
(360) 664-1160

Representatives:

Don Trotter and Shannon Smith  
Assistant Attorneys General  
1400 S. Evergreen Park Drive S.W.  
P.O. Box 40128  
Olympia, WA 98504-0128  
(360) 664-1188

Respondent:

Christy Omohundro  
Vice President, Regulation  
PacifiCorp  
825 NE Multnomah, Suite 800  
Portland, OR 97232  
(503) 813-6065

Representatives:

James M. Van Nostrand  
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(206) 386-7665

Stephen C. Hall  
Stoel Rives LLP  
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(503) 294-9625

Public Counsel:

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Office of the Attorney General  
900 Fourth Avenue, Suite 2000  
Seattle, WA 98164-1012  
(206) 464-7744



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Shari Walker  
Energy Program  
Natural Resources Defense Council