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STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

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

WASHINGTON UTILITIES AND)
TRANSPORTATION)
COMMISSION,)
)
Complainant,)
)
v.)
)
PACIFICORP D/B/A/ PACIFIC)
POWER & LIGHT COMPANY)
)
Respondent.)
.....)

DOCKET NO. UE-080220

PETITION TO INTERVENE
OF THE ENERGY PROJECT

COMES NOW, Petitioner The Energy Project, by and through its undersigned legal counsel, and pursuant to WAC 480-07-355, and that Notice of Prehearing Conference issued by this Commission on February 20, 2008, respectfully petitions for the right to intervene as a party to the above-captioned proceeding, with all rights and responsibilities appurtenant thereto.

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

- (i) The Petitioner's name and address is The Energy Project, 1701 Ellis St., Bellingham, WA., 98225;
- (ii) The Energy Project is a non-profit organization that for roughly the past twelve years has advocated 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 PacifiCorp's service territory. OIC has unique knowledge and experience through providing services to low-income households. OIC, through The Energy Project, is a party to the current PacifiCorp rate case, Docket No. UE-050684. The Energy Project has also previously intervened in numerous other proceedings before this Commission. The Energy Project has partnered with the Washington State Community Action Program and the Washington Department of Commerce, Trade and Economic Development.

The Energy Project has a special interest in this proceeding because of the potential for a merged utility to either enhance its treatment of the needs of its low-income customers, or neglect those needs. The Energy Project is particularly interested in maintaining energy assistance and energy efficiency programs that could mitigate the impact of the proposed rate increases for low-income households.

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.

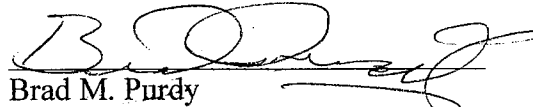
(iii) Though Petitioner has not yet had ample opportunity to fully assess all matters in controversy and formulate a precise position on such matters, Petitioner generally takes the position that the rate increase is unjustified in magnitude, will increase the number of households unable to afford electricity service, reduce the 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 lower energy bills;

(iv) Petitioner does not believe that its involvement in this proceeding would unduly broaden the issues;

(v) The name and address of Petitioner's attorney is set forth above. Petitioner's attorney is simultaneously filing a Notice of Appearance in conformity with WAC 480-07-345(2).

(vi) Petitioner requests that all documentation in this case be sent not to The Energy Project, whose address is listed in paragraph (i) but to its legal counsel, Brad M. Purdy, 2019 N. 17th St., Boise, ID 83702. Land line.208.384.1299, Cell, 208,484.9980
DATED, this 3rd day of March, 2008.


Brad M. Purdy
Attorney for Petitioner