

#### OFFICE OF THE GENERAL COUNSEL

2320 California Street • Everett, WA • 98201 • 425-783-8212 Toll-free in Western Washington at 1-877-783-1000, ext. 8212 FAX 425-783-8305 • www.snopud.com Mailing Address: P. O. Box 1107 • Everett, WA • 98206-1107

July 22, 2005

Carole J. Washburn Secretary Washington Utilities & Transportation Commission 1300 S. Evergreen Park Drive S.W. Olympia, WA 98504

In the Matter of the Joint Application of MIDAMERICAN ENERGY HOLDINGS COMPANY AND PACIFICORP, d/b/a PACIFIC POWER & LIGHT COMPANY For an Order Authorizing Proposed Transaction Docket No. UE-051090

Dear Ms. Washburn:

Re:

Enclosed please find the original and thirteen (13) copies each of the Petition to Intervene and the Notice of Appearance of Public Utility District No. 1 of Snohomish County, WA.

Electronic copies will be emailed to the Records Center on July 22, 2005. Please return one file-stamped copy of each document in the self-addressed, stamped envelope provided. Thank you for your assistance.

Sincerely yours,

Raymond F. Finnen

Paralegal

Enclosures

cc: Service List

#### BEFORE THE

## WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Joint Application of	) DOCKET NO. UE-051090
MIDAMERICAN ENERGY HOLDINGS COMPANY AND PACIFICORP, d/b/a PACIFIC	) NOTICE OF APPEARANCE OF ) PUBLIC UTILITY DISTRICT NO. 1 OF ) SNOHOMISH COUNTY, WA
POWER & LIGHT COMPANY	)
For an Order Authorizing Proposed Transaction.	) ) ) )

Michael J. Gianunzio and Eric L. Christensen hereby notify the Washington Utilities and Transportation Commission that they will appear in the above-captioned proceeding as Counsel for Public Utility District No. 1 of Snohomish County, WA. Michael J. Gianunzio, Washington State Bar Number 23737 is a member in good standing of the Washington State Bar Association, and Eric L. Christensen, Washington State Bar Number 27934 is admitted to practice, in good standing, before the highest court of Washington.

This notice of appearance is filed pursuant to WAC § 480-07-345(2).

Dated in Everett, WA, this 22nd day of July, 2005.

Respectfully submitted,

PUBLIC UTILITY DISTRICT NO. 1 OF

SNOHOMISH QUINTY, WA

Michael J. Gianunzio

Eric L. Christensen

Public Utility District No. 1 of Snohomish County

2320 California Street, P.O. Box 1107

Everett, WA 98206-1107

(425) 783-1000 telephone

(425) 783-8605 facsimile

mjgianunzio@snopud.com

elchristensen@snopud.com

### BEFORE THE

### WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Joint Application of	) DOCKET NO. UE-051090
MIDAMERICAN ENERGY HOLDINGS COMPANY AND	) PETITION TO INTERVENE OF ) PUBLIC UTILITY DISTRICT NO. 1 OF
PACIFICORP, d/b/a PACIFIC	) SNOHOMISH COUNTY,
POWER & LIGHT COMPANY	) WASHINGTON
For an Order Authorizing Proposed Transaction.	) ) )

Pursuant to WAC § 480-07-355, Public Utility District No. 1 of Snohomish County, Washington ("Snohomish"), hereby petitions the Washington Utilities and Transportation Commission ("WUTC" or "Commission") for leave to intervene in the above-referenced Docket, as an Intervenor with full party status as described in WAC § 480-07-340. The business address of Snohomish is:

General Counsel Snohomish County PUD 2320 California Street PO Box 1107 Everett, WA 98206-1107

All documents relating to these proceedings should be served on Snohomish's attorneys at the following address:

Michael J. Gianunzio
General Counsel
Eric Christensen
Assistant General Counsel
Snohomish County PUD
2320 California Street
PO Box 1107
Everett, WA 98206-1107

E-Mail: elchristensen@snopud.com

Telephone: (425) 783-8649 Facsimile: (425) 783-8305

The administrative rules at issue are WAC §§ 480-07-340, -355.

Snohomish is a Public Utility District formed by a vote of the people of Snohomish County in 1936 to operate pursuant to Title 54 of the Revised Code of Washington. Snohomish is a not-for-profit, non-public distribution utility that serves approximately 270,000 residential customers and 27,000 commercial and industrial customers in Snohomish County and on neighboring Camano Island in the State of Washington. Snohomish is exempt from the jurisdiction of the WUTC under RCW § 54.16.040.

In order to serve its customer-owners, Snohomish depends upon the regional transmission system to move power from generation sources remote from Snohomish County to its load. Snohomish also depends upon the purchase of power in the Western wholesale markets to meet a significant portion of the needs of its customer-owners.

Snohomish has a substantial interest the Application filed by MidAmerican Energy Holdings Company and PacifiCorp to the extent the proposed acquisition may affect generation or transmission market power or the operation of the regional transmission grid. Snohomish seeks to intervene in this proceeding to ensure

PETITION TO INTERVENE -2

OFFICE OF GENERAL COUNSEL SNOHOMISH COUNTY PUD NO. 1 PO Box 1107, Everett, WA 98206 Tele: 425/783-8212, Fax: 425/783-8305 that the proposed acquisition complies with Washington law and will not harm Snohomish's customers.

As described above, Snohomish has a direct and substantial interest in this proceeding that will not be adequately represented by any other party, and may be affected by any Commission determination made in connection with this proceeding. It is in the public interest to allow Snohomish to intervene in this proceeding.

WHEREFORE, Snohomish respectfully petitions the Commission for leave to intervene in this proceeding.

Dated in Everett, Washington, this 22nd day of July, 2005.

Respectfully submitted,

Michael J. Giananzio General Counsel Eric Christensen

Assistant General Counsel Snohomish County PUD 2320 California Street PO Box 1107

Everett, WA 98206-1107

E-Mail: elchristensen@snopud.com

Telephone: (425) 783-8649 Facsimile: (425) 783-8305

# CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing Petition to Intervene and Notice of Appearance of Public Utility District No. 1 of Snohomish County, WA upon the parties, shown below, listed on the official service list in UE-051090, by causing the same to be mailed, postage-prepaid, through the U.S. Mail.

DATED at Everett, WA, this 20th day of July, 2005.

Public Utility District No. 1 of Snohomish County, WA

Raymond F. Finnen

Paralegal

James Van Nostrand Stoel Rives LLP 900 SW Fifth Avenue, Suite 2600 Portland, OR 97204

Robert Cedarbaum Washington Utilities and Transportation Commission 1400 S Evergreen Park Drive SW Olympia, WA 98504

Douglas Anderson MidAmerican Energy Holdings Company 302 S. 36th Street, Suite 400 Omaha, NB 68131 Andrea Kelly PacifiCorp 825 N.E. Multnomah St., Suite 956 Portland, OR 97232

Robert Cromwell
Office of the Attorney General
Public Counsel Section
900 Fourth Avenue, Suite 2000
Seattle, WA 98164

Mark Moench MidAmerican Energy Holdings Company 2755 E. Cottonwood Parkway, Suite 300 Salt Lake City, UT 84171