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**SENT VIA FACSIMILE**

July 25, 2005

Washington Utilities Transportation Commission  
 1300 S. Evergreen Park Drive S.W.  
 P.O. Box 47250  
 Olympia, WA. 47250

Re: Docket No. UE-051090: WUTC v. PacifiCorp

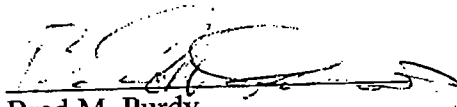
Dear Sir/Madam:

Enclosed, please find The Energy Project's Petition to Intervene and my Notice of Appearance on behalf of The Energy Project in the above-referenced proceeding. I am faxing copies of each of these documents, and overnight mailing an original and twelve copies to your physical address today.

I have spoken with your legal division and was informed that it will be acceptable for me to appear at tomorrow's prehearing conference by telephone in this case due to scheduling conflicts and to minimize costs for my client.

Thank you for your assistance in this matter.

Very truly yours,

  
 Brad M. Purdy

Brad M. Purdy  
 Attorney at Law  
 Idaho State Bar No. 3472  
 2019 N. 17<sup>th</sup> St.  
 Boise, ID. 83702  
 (208) 384-1299  
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[bmpurdy@hotmail.com](mailto:bmpurdy@hotmail.com)  
 Attorney for Petitioner

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

In the matter of the joint application	)	
of	)	DOCKET NO. UE-051090
	)	
MIDAMERICAN ENERGY	)	PETITION TO INTERVENE
HOLDINGS COMPANY AND	)	OF THE ENERGY PROJECT
PACIFICORP, d/b/a/ PACIFIC	)	
POWER & LIGHT COMPANY	)	
	)	
for an Order Authorizing Proposed	)	
Transaction	)	
	)	
.....	)	

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 July 15, 2005, 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).

DATED, this 28<sup>th</sup> day of July, 2005.



Brad M. Purdy  
Attorney for Petitioner

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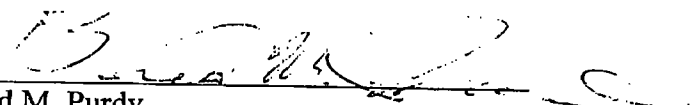
**BEFORE THE WASHINGTON STATE  
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HOLDINGS COMPANY AND	)	
PACIFICORP, d/b/a/ PACIFIC	)	
POWER & LIGHT COMPANY	)	
	)	
for an Order Authorizing Proposed	)	
Transaction	)	
	)	
.....	)	

COMES NOW, Brad M. Purdy, Attorney at Law and, pursuant to WAC 480-07-345(2), enters an appearance as legal counsel of record for Intervenor The Energy Project, whose Petition to Intervene has been simultaneously filed with this Notice.

The undersigned swears and attests that he is a member in good standing of the Idaho Bar Association (Bar No. 3472) and is admitted to practice before the highest court of the state of Idaho, the Idaho Supreme Court.

DATED, this 25<sup>th</sup> day of JULY, 2005.

  
 \_\_\_\_\_  
 Brad M. Purdy