

John S. Bishop
Adam S. Arms
MCKANNA BISHOP JOFFE & SULLIVAN LLP
1635 NW Johnson St.
Portland OR 97209
Telephone: (503) 226-6111
FAX: (503) 226-6121

Attorneys for IBEW, Local 125

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

In the Matter of the Joint Application of)	DOCKET NO. UE-051090
)	
MIDAMERICAN ENERGY HOLDINGS)	PETITION TO INTERVENE OF
COMPANY AND PACIFICORP, dba)	INTERNATIONAL BROTHERHOOD OF
PACIFIC POWER & LIGHT COMPANY)	ELECTRICAL WORKERS, LOCAL 125
)	
For an Order Authorizing Proposed)	
Transaction)	

The International Brotherhood of Electrical Workers Union, Local 125 (“Local 125” or “Union”) hereby petitions the Washington State Utilities and Transportation Commission (“WUTC” or “Commission”), pursuant to WAC § 480-07-355, for an order granting the Union the right to intervene as an interested party in this proceeding.

The Union’s contact information:

William Miller
Nancy Harper
IBEW, Local 125
17200 NE Sacramento
Gresham, OR 97230
(Phone) 503-262-9125
(Fax) 503-262-9947
(Email) bill@ibew125.com; nancy@ibew125.com

The Union's counsel is:

John S. Bishop
Adam S. Arms
McKanna Bishop Joffe & Sullivan LLP
1635 NW Johnson St.
Portland, OR 97209
(Phone) 503-226-6111
(Fax) 503-226-6121
(E-mail) jbishop@mbjlaw.com; aarms@mbjlaw.com

The Union requests that correspondence be sent directly to the Union; correspondence need not be copied to the Union's counsel.

The Union is a labor organization within the meaning of 29 USC §152(5). The Union serves as the collective bargaining agent for workers in the electrical utility industry in significant sectors of the Northwest United States. It has labor agreements with approximately 35 employers in the utility industry, including the Bonneville Power Administration, Portland General Electric and PacifiCorp. The Union is the exclusive collective bargaining representative for PacifiCorp's outside electrical service employees working in Washington and northern Oregon. The Union's total membership is approximately 3600. It represents approximately 850 PacifiCorp employees.

The Union represents a substantial number of PacifiCorp employees and has an interest and, indeed, an obligation to safeguard their working conditions, workplace safety, wages, and job security. To the extent that the instant case can affect those matters, the Union has a substantial interest in it.

The Union has special expertise on matters relating to the safety and maintenance of electrical power installations. The Union is involved in training its members extensively in such

areas. It deals daily with these issues, both with PacifiCorp and numerous other utilities throughout Oregon and the Northwest United States. The Union can and would, when appropriate, offer information on these matters and on other workplace issues to assist the Commission in resolving the issues in this proceeding. It is in the public interest to allow the Union to intervene in this proceeding. The Union's intervention will not unreasonably broaden the issues, burden the record, or delay this proceeding.

Based on the information provided above in accordance with the Commission's rules of procedure, the Union requests to participate in this proceeding as an intervenor.

DATED: August 2, 2005.

Respectfully submitted,

MCKANNA BISHOP JOFFE & SULLIVAN LLP

John S. Bishop, OSB No. 89022
Adam S. Arms, OSB No. 01018
Of Attorneys for IBEW, Local 125

X:\Bishop\IBEW Local 125 05\05 General\Mid-American\WA WUTC Petition.wpd