

H  
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February 19, 2013

**VIA ELECTRONIC FILING & U.S. MAIL**

Oregon Public Utility Commission  
Attn: Filing Center  
550 Capitol Street, N.E., #215  
P.O. Box 2148  
Salem, Oregon 97308-2148

Re: In the Matter of Centurytel of Oregon, Inc., Centurytel of Eastern Oregon, Inc.,  
United Telephone Company of the Northwest, Qwest Corporation, Frontier  
Communications Northwest, Inc., Citizens Telecommunications of Oregon,  
Oregon Telecommunications Association and the Oregon Cable  
Telecommunications Association  
**Docket No. UM 1643**

Dear Filing Center:

Enclosed please find the original and one (1) copy of the OREGON RURAL ELECTRIC  
COOPERATIVE ASSOCIATION'S PETITION TO INTERVENE and WAIVER OF PAPER  
SERVICE in the above-referenced docket.

Thank you for your assistance with this filing. Should you have any questions, please  
feel free to contact me.

Very truly yours,



Tommy A. Brooks

TAB:sk  
Enclosures

cc via electronic delivery:  
UM 1643 Service List

**BEFORE THE PUBLIC UTILITY COMMISSION**

**OF OREGON**

**UM 1643**

In the Matter of

CENTURYTEL OF OREGON, INC.,  
CENTURYTEL OF EASTERN OREGON,  
INC., UNITED TELEPHONE COMPANY  
OF THE NORTHWEST, QWEST  
CORPORATION, FRONTIER  
COMMUNICATIONS NORTHWEST,  
INC., CITIZENS  
TELECOMMUNICATIONS OF OREGON,  
OREGON TELECOMMUNICATIONS  
ASSOCIATION, and the OREGON CABLE  
TELECOMMUNICATIONS  
ASSOCIATION

Petition for Waiver of Certain Requirements  
of OAR 860-024-0012(3)(c)

OREGON RURAL ELECTRIC  
COOPERATIVE ASSOCIATION'S  
PETITION TO INTERVENE

and Waiver of Paper Service

Pursuant to ORS § 756.525, OAR § 860-001-0300(2), and the Notice of Prehearing Conference issued February 6, 2013, the Oregon Rural Electric Cooperative Association (“ORECA”) hereby submits this Petition to Intervene in the above-captioned proceeding and seeks party status as provided in OAR § 860-001-0300(7). In support of this Petition to Intervene, ORECA states as follows:

1. The name and address of ORECA as a party of record in this proceeding is:

Ted Case  
Executive Director  
Oregon Rural Electric Cooperative Association  
698 12th Street, SE #210  
Salem, Oregon 97301  
Telephone: (503) 585-9988  
Facsimile: (503) 585-2147  
E-Mail: tcase@oreca.org

Richard G. Lorenz and Tommy A. Brooks from the law firm Cable Huston Benedict Haagensen & Lloyd will represent ORECA in this proceeding. All documents related to this proceeding should be served on ORECA's attorneys at the following address:

Richard G. Lorenz  
Tommy A. Brooks  
Cable Huston  
1001 SW Fifth Ave., Suite 2000  
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2. ORECA also requests that the following two individuals be added to this docket as interested persons pursuant to OAR 860-001-0300(8) and that they receive only electronic versions of all documents shared with interested persons:

Lisa Logie  
[llogie@oreca.org](mailto:llogie@oreca.org)

Stuart Sloan  
[stuarts@cpi.coop](mailto:stuarts@cpi.coop)

3. ORECA is a 501(c)(6) trade association representing the legislative and regulatory interests of Oregon's 18 electric cooperative utilities. These co-ops serve customers in 30 of Oregon's 36 counties, and provide electricity to over 200,000 customers.

4. Petitioners initiated this docket seeking a "waiver" of certain Commission rules relating to the correction of safety violations for pole attachments.

5. ORECA's members participated in the development of the Commission's rules at issue in the proceeding. ORECA also participated in the initial public hearing in this matter. ORECA's participation in this proceeding will continue to assist the Commission in resolving the issues, and will not unreasonably broaden the issues, unduly burden the record, or delay the proceeding.

6. ORECA waives paper service of documents in this proceeding.

WHEREFORE, ORECA respectfully requests leave to intervene and requests all the rights of a party in this proceeding.

Dated this 19<sup>th</sup> day of February 2013.

Respectfully submitted,



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Of Attorneys for the  
Oregon Rural Electric Cooperative Association

## CERTIFICATE OF SERVICE

I CERTIFY that I have on this day served the foregoing document upon all parties of record in this proceeding via electronic mail and/or by mailing a copy properly addressed with first class postage prepaid.

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Dated in Portland, Oregon, this 19<sup>th</sup> day of February 2013.



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