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July 6, 2005

Via Electronic and US Mail

Public Utility Commission
Attn: Filing Center
550 Capitol St. NE #215
P.O. Box 2148
Salem OR 97308-2148

Re: In the Matter of STEPHEN FORBES COOPER, LLC, as Disbursing Agent, on behalf of the RESERVE FOR DISPUTED CLAIMS
Docket No. UF 4218

In the Matter of Application for an Order Allowing the Reserve for Disputed Claims to Acquire the Power to Exercise Substantial Influence over the Affairs and Policies of Portland, General Electric Company Pursuant to ORS 757.511
Docket No. UM 1206

Dear Filing Center:

Enclosed please find original and two copies of the Petition to Intervene of the Industrial Customers of Northwest Utilities in the above-referenced docket.

Sincerely,

/s/ Sheila R. Ho
Sheila R. Ho

Enclosures

cc: Service List

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing Petition to Intervene of the Industrial Customers of Northwest Utilities upon the parties, on the service list shown below, by causing the same to be mailed, postage-prepaid, through the U.S. Mail, as well as via electronic mail. In addition, pre-certified organizations were served by the same methods as the service list.

Dated at Portland, Oregon, this 6th day of July, 2005.

/s/ Sheila R. Ho
Sheila R. Ho

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* Denotes pre-certified organizations

1. The business address of ICNU is:

Ken Canon
Industrial Customers of Northwest Utilities
333 SW Taylor, Suite 400
Portland, OR 97204

2. ICNU will be represented in this proceeding by Davison Van Cleve, P.C.

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

Melinda J. Davison
Davison Van Cleve, P.C.
333 SW Taylor, Suite 400
Portland, OR 97204
E-Mail: mjd@dvclaw.com
Telephone: 503-241-7242
Facsimile: 503-241-8160

3. ICNU is an incorporated, non-profit association of large industrial electric customers in the Pacific Northwest, with offices in Portland, Oregon. A list of ICNU members is included as Attachment A. Many members of ICNU are customers of Portland General Electric Company ("PGE" or the "Company") as indicated on Attachment A.

4. ICNU has a substantial interest in the outcome of this proceeding. PGE and Stephen Forbes Cooper, LLC ("SFC") (collectively, the "Applicants") have filed a Joint Application requesting certain approvals related to the proposed transfer of 100% of PGE's common equity from Enron Corporation ("Enron") to creditors of Enron and other Debtors. PGE requests a Commission order pursuant to ORS § 757.410 et seq. authorizing PGE to issue 62,500,000 shares of "New PGE Common Stock." SFC requests an order pursuant to ORS § 757.511 authorizing the "Reserve for Disputed Claims" to hold more than five percent of the New PGE Common Stock. The Applicants state that these authorizations are being requested

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to implement the directive in the Enron Bankruptcy Plan (the “Plan”) to transfer PGE’s common equity to Enron creditors and other debtors by canceling the Company’s existing common stock and issuing New PGE Common Stock.

5. In Oregon, the transfer of ownership of a public utility such as PGE must “serve the public utility’s customers in the public interest.” ORS § 757.511(3). The Commission has determined that to meet this standard, the transfer of ownership must result in “net benefits” to the utility’s customers. In Re Legal Standard for Approval of Mergers, OPUC Docket No. UM 1011, Order No. 01-778 at 12 (Sept. 4, 2001).

6. In this proceeding, ICNU intends to review the Application submitted by PGE and SFC for any issues regarding and impacts that the proposed transfer of ownership would have on rates and the quality of service. ICNU has a particular interest in: 1) ensuring that any Commission order regarding the approvals requested in the Application is consistent with the OPUC’s precedent and policies under ORS § 757.511; 2) maintaining the customer protections and benefits that exist under the Enron merger conditions that currently are in effect; and 3) ensuring that the obligations under the existing Enron merger conditions have consistently been fulfilled and that customers receive commensurate benefits if any obligations are determined to have not been fulfilled. This is a preliminary list of concerns, and ICNU intends to raise additional issues as the case proceeds.

7. ICNU represents the interests of many of PGE’s largest customers and has participated in many proceedings before the Commission involving PGE, including three previous proceedings in which other entities unsuccessfully attempted to complete a transfer of ownership of PGE. ICNU’s intervention in this proceeding will assist the Commission in

resolving the issues, and will not unreasonably burden the record, delay the proceedings, or broaden the issues.

8. As described above, ICNU 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 the Application. It is in the public interest to allow ICNU to intervene in this proceeding.

WHEREFORE, ICNU respectfully requests that the Commission grant this Petition to Intervene ordering full party status for ICNU in this proceeding.

Dated this 6th day of July, 2005.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Melinda J. Davison

Melinda J. Davison

Matthew W. Perkins

Davison Van Cleve, P.C.

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Of Attorneys for Industrial Customers of Northwest
Utilities

ATTACHMENT A
INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

Air Liquide
Air Products
BPB Gypsum, Inc.
Blue Heron Paper Company*
Boeing*
Boise Cascade*
CNC Containers, Northwest
Chemi-Con Materials Corporation
Dyno Nobel, Inc.
ConAgra Foods
Eka Chemicals, Inc.
Evanite Fiber
Georgia-Pacific
Grays Harbor Paper, L.P.
Hewlett-Packard
Inland Empire Paper Co.
Intel*
J.R. Simplot
Kimberly-Clark Corporation
Longview Fibre
Microsoft Corporation
Norpac Foods*
Noveon Kalama, Inc.
Oregon Steel Mills*
PCC Structural, Inc.*
Ponderay Newsprint Co
Shell Oil Products US
Simpson Paper
Simpson Timber
Solar Grade Silicon LLC
Tesoro Refining and Marketing Co.
Wah Chang
West Linn Paper Company*
Weyerhaeuser*

**Denotes PGE Customers*