

**BEFORE THE PUBLIC UTILITY COMMISSION**

**OF OREGON**

**UF 4218  
UM 1206**

In the Matter of the Application of	)	
PORTLAND GENERAL ELECTRIC	)	
COMPANY for an Order Authorizing the	)	EUGENE WATER AND
Issuance of 62,500,000 Shares of New	)	ELECTRIC BOARD'S PETITION
Common Stock Pursuant to ORS 757.410 et	)	TO INTERVENE
seq.	)	
	)	
And	)	
	)	
In the Matter of the Application of STEPHEN	)	
FORBES COOPER, LLC, as Disbursing	)	
Agent, on behalf of the RESERVE FOR	)	
DISPUTED CLAIMS, 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	)	
	)	
	)	
	)	
	)	
	)	

**EUGENE WATER AND ELECTRIC BOARD'S PETITION TO INTERVENE**

Pursuant to ORS § 756.525 and OAR § 860-013-0021, the Eugene Water and Electric Board ("EWEB") hereby submits this Petition to Intervene in the above-captioned proceedings and seeks party status as provided in OAR § 860-011-0035(5). In support of this Petition, EWEB states as follows:

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

Ken Beeson  
Energy Resource Projects Manager  
Eugene Water & Electric Board  
500 East Fourth Avenue  
P.O. Box 10148  
Eugene, Oregon 97440-2148  
(541) 484-2411  
(541) 341-1889 (fax)  
Email: [ken.beeson@eweb.eugene.or.us](mailto:ken.beeson@eweb.eugene.or.us)

J. Laurence Cable will represent EWEB in this proceeding. All documents related to this proceeding should be served on EWEB's attorneys at the following address:

Larry Cable  
Cable Huston Benedict Haagensen & Lloyd LLP  
1001 SW 5<sup>th</sup> Avenue, Suite 2000  
Portland, OR 97204  
Telephone: (503) 224-3092  
Facsimile: (503) 224-3176  
E-Mail: [lcable@chbh.com](mailto:lcable@chbh.com)

2. EWEB is a municipal utility organized under the City of Eugene Charter and the Constitution and laws of the State of Oregon. EWEB is not a public utility subject to the general jurisdiction of the Oregon Public Utility Commission ("Commission"). ORS 757.065(1)(b)(A).

3. EWEB has a direct and substantial interest in this proceeding. EWEB is a co-owner and co-licensee with PGE of the Trojan Nuclear Project and the Trojan independent spent fuel storage installation (collectively, "Trojan"). Activities relating to decommissioning and spent fuel responsibilities at Trojan are ongoing and will continue for many years into the future. PGE, as majority owner, must maintain sufficient financial resources, on both a long-term and short-term cash flow basis, to meet its Trojan obligations. This proceeding addresses a proposal to issue new common stock and an order allowing the "Reserve for Disputed Claims" to hold

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more than five percent of the new PGE common stock. Accordingly, this application could impact the financial resources available to PGE to meet its Trojan obligations.

4. EWEB's participation in this proceeding will assist the Commission in resolving the issues, and will not unreasonably broaden the issues, unduly burden the record, or delay the proceeding. No other party can adequately represent EWEB's interest, and EWEB will be affected by any Commission determination made in this proceeding.

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

DATED: This 18<sup>TH</sup> day of July, 2005

Respectfully submitted,



for J. Laurence Cable OSB # 71035  
Cable Huston Benedict Haagensen & Lloyd LLP  
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Of Attorneys for Eugene Water and Electric Board

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I served the foregoing **EUGENE WATER AND ELECTRIC BOARD'S PETITION TO INTERVENE** in Dockets UF 4218 and UM 1206, as indicated below, on the parties listed on the attached current Service List obtained from the Oregon Public Utility Commission's Website:

[XX] by **MAILING** a full, true and correct copy thereof in a sealed, postage-paid envelope, addressed as shown on the attached Service List, and deposited with the U.S. Postal Service at Portland, Oregon, on the date set forth below;

[XX] **and** by **electronic mail** ("e-mail") to those parties on the Oregon Public Utility Commission's Website Service List who listed an e-mail address.


**SERVICE LIST**

Stephanie S. Andrus Department of Justice Regulated Utility & Business Section 1162 Court Street NE Salem, OR 97301-4096 <a href="mailto:Stephanie.andrus@state.or.us">Stephanie.andrus@state.or.us</a>	J. Jeffrey Dudley Portland General Electric 121 SW Salmon Street, 1WTC1300 Portland, OR 97204 <a href="mailto:Jay.dudley@pgn.com">Jay.dudley@pgn.com</a>
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DATED; This 18<sup>th</sup> day of July, 2005.

Respectfully submitted,



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