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3 **BEFORE THE PUBLIC UTILITY COMMISSION**
4 **OF OREGON**

5 **UE 180**

6 In the Matters of)
7 PORTLAND GENERAL ELECTRIC COMPANY) PETITION OF CITY OF
8 Request for a General Rate Revision) PORTLAND TO INTERVENE

9
10 Pursuant to ORS 756.525 and OAR 860-012-0001, the City of Portland respectfully
11 petitions the Commission for leave to intervene as a party in the Commission’s review of
12 Portland General Electric’s, (“PGE”), rate filing on the following grounds:

13 1. The City of Portland is a municipal corporation duly organized and existing under
14 the laws of the State of Oregon.

15 2. For purposes of its participation in this proceeding, correspondence and service
16 papers should be sent to the City at the following addresses:

17 David Tooze Richard Gray
18 Office of Sustainable Development Portland Office of Transportation
19 City of Portland 1120 S.W. 5th Avenue, Room 800
20 721 NW 9th, Room 350 Portland, OR 97204
21 Portland, OR 97209 Fax: 503-823-7609
22 Fax: 503-823-5311 e-mail: richard.gray@pdxtrans.org
23 e-mail: dtooze@ci.portland.or.us

24 3. Correspondence and service of papers related to this proceeding should be sent to
25 the City’s counsel and consultant at the following address:

26 Benjamin Walters
Deputy City Attorney
Office of City Attorney
1220 S.W. 5th Avenue, Room 315
Portland, OR 97204
Fax: 503-823-3089
e-mail: bwalters@ci.portland.or.us

1 4. The City of Portland has a substantial interest in PGE’s application to revise its
2 rates. The proposed rate changes would substantially and directly affect the City of Portland as a
3 municipal corporation and as a customer of PGE. This matter is of vital significance to the City
4 of Portland.

5 (a) PGE is one of two private electric utilities that serve citizens and
6 businesses within Portland. The City has the right and obligation to act to protect the interests of
7 its citizens in public utility matters. To protect the broad public interest of the citizens of
8 Portland, the City has an interest in the impact of the revised tariffs upon residential and
9 commercial electricity customers within the City of Portland.

10 (b) The City is one of PGE’s sizable customers, with approximately 850
11 accounts and annual utility billings of almost \$10.4 million (not including street light
12 maintenance). The City has an obligation to keep its electricity expenditures low, minimizing
13 costs for taxpayers.

14 (c) Existing City policies support sustainable energy and environmental
15 actions, including energy-efficiency services for homeowners and businesses; promotion of
16 clean, renewable energy resources; and weatherization and bill-paying assistance services for
17 lower income households.

18 5. The City will address such issues as it deems relevant to its interests in this
19 proceeding, including both issues that it identifies itself within the time set for such action and
20 issues identified by others that may affect City interests.

21 6. The City’s appearance and participation will not unreasonably broaden the issues,
22 burden the record, or delay this proceeding.

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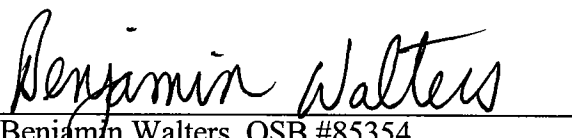
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WHEREFORE, the City of Portland requests an order authorizing it to intervene as a party in this proceeding.

DATED this 19th day of April, 2006.

Respectfully submitted,



Benjamin Walters, OSB #85354
Senior Deputy City Attorney
Of Attorneys for City of Portland

1 CERTIFICATE OF SERVICE

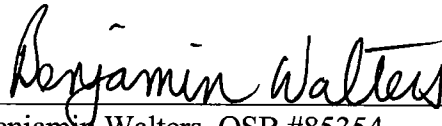
2 I hereby certify that I served a copy of the foregoing PETITION OF CITY OF
3 PORTLAND TO INTERVENE to:

4 Public Utility Commission of Oregon
5 Attn: Filing Center
6 PO Box 2148
7 Salem OR 97308-2148

8 on the 19th day of April, 2006, by electronic copy to the Case Manager, Judy Johnson, e-mail
9 address: judy.johnson@state.or.us and by mailing the original and two copies of said document,
10 contained in a sealed envelope with postage paid, and deposited in the post office at Portland,
11 Oregon on said day.

12 I further certify that I served a copy of the foregoing PETITION OF CITY OF
13 PORTLAND TO INTERVENE on the individuals identified on the attached Service List by
14 electronic mail and by mailing a copy of said document in a sealed envelope with postage paid,
15 and deposited in the post office at Portland, Oregon on said day.

16 DATED this 19th day of April, 2006

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18 Benjamin Walters, OSB #85354
19 Senior Deputy City Attorney
20 Of Attorneys for City of Portland
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SERVICE LIST

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