

**BEFORE THE
PUBLIC UTILITY COMMISSION
OF OREGON**

IN THE MATTER OF:

**PORTLAND GENERAL ELECTRIC
COMPANY**

Request for a General Rate Revision

CASE No. UE 180/UE 181

**PETITION TO INTERVENE
OF
ELSTER ELECTRICITY, LLC, CELLNET TECHNOLOGY, INC. AND HUNT
TECHNOLOGIES, INC.**

AND NOW COMES **Scott H. DeBroff, Esquire** of LeBoeuf, Lamb, Greene & MacRae LLP, on behalf of his clients, **Elster Electricity, LLC** ("Elster"), **Cellnet Technology, Inc.** ("Cellnet") and **Hunt Technologies, Inc.** ("Hunt"), for the purpose of this "Petition To Intervene" with respect to this proceeding before the Oregon Public Utility Commission ("OPUC" or the "Commission") and avers the following:

1. **Elster Electricity, LLC** ("Elster") is a party interested in the above-captioned docket as it is a meter technology provider which has participated extensively in proceedings in other states involving the implementation of the Energy Policy Act of 2005, specifically the Smart Metering and Demand Response provisions beginning at Section 1252 of the Electricity Title of the Act.

2. Elster Electricity with its headquarters its headquarters in Raleigh, North Carolina and operations in 22 countries, serving customers in over 70 countries, is a leading provider of advanced metering infrastructure (AMI) solutions that help utility companies improve revenue cycle services, customer service, delivery reliability, and workforce utilization. With more than 100 years of electricity metering experience (formerly as Westinghouse Electric Corporation and ABB Electricity Metering), Elster Electricity understands the unique requirements of utility customers worldwide.

3. **Cellnet Technology, Inc.** ("Cellnet") is a party interested in the above-captioned docket as it is a meter technology provider which has participated extensively in proceedings in other states involving the implementation of the Energy Policy Act of 2005, specifically the Smart Metering and Demand Response provisions beginning at Section 1252 of the Electricity Title of the Act.

4. Cellnet Technology, Inc., with its headquarters in Atlanta, Georgia, supplies natural gas, water, and electric utilities with highly reliable, field-proven products that enable them to communicate with residential and commercial and industrial (C&I) meters using wireless and IP network communications.

5. **Hunt Technologies Inc.** ("Hunt") is also a party interested in the above-captioned docket as it is a meter technology provider which has participated extensively in rulemaking proceedings in other states involving the implementation of the Energy Policy Act of 2005 as well.

6. Hunt Technologies Inc., with its international headquarters in Pequot Lakes, Minnesota, provides electric, water, and natural gas automated meter reading systems for Investor-Owned Utilities, Rural Electric Cooperatives, and Municipal Governments.

7. Elster, Cellnet and Hunt have been involved extensively in a number of EPACT related smart metering proceedings across the country before other state public utility commissions. Our interest in intervening in this proceeding is to inform and educate the Commission on the issues related to smart metering technology and demand response that are a component part of PGE's general rate filing.

8. Elster, Cellnet and Hunt have a substantial and bona fide interest in the subject matter of this docket and their interests cannot be represented or protected adequately by other existing parties to this docket.

9. Elster, Cellnet and Hunt intend to play a constructive role in the Commission's decision-making process herein and their participation will not unduly prejudice any party.

10. Elster, Cellnet and Hunt respectfully request that their "Petition for Intervention" be granted and the parties awarded full party status in this case and placed on the Commission's Official Service List for this docket.

11. All communications and pleadings in this docket should be directed to:

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been sent by U.S. First Class mail, facsimile, electronically or hand delivery, to all parties of record in this proceeding:

Respectfully submitted,

Dated: **May 11, 2006**

By: _____ /s/

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**SERVICE LIST
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UE 180**

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