### CABLE HUSTON BENEDICT HAAGENSEN & LLOYD LLP

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May 9, 2006

## VIA ELECTRONIC FILING & FIRST CLASS MAIL

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

Re:

UE 180 – In the Matter of Portland General Electric Company

Request for a General Rate Revision

#### Dear Filing Center:

Enclosed for filing are the original and five copies of the Eugene Water & Electric Board's Petition to Intervene in the above-captioned proceeding.

Thank you for your assistance in this matter. Should you have any questions regarding this matter, please feel free to contact me. Thank you.

Very truly yours,

Chad M. Stokes

cc: UE-180 Service List (via email & first class mail)

#### BEFORE THE PUBLIC UTILITY COMMISSION

#### **OF OREGON**

**UE 180** 

In the Matter of PORTLAND GENERAL ELECTRIC COMPANY	)	EUGENE WATER & ELECTRIC BOARD'S PETITION TO INTERVENE
Request for a General Rate Revision	)	

Pursuant to ORS § 756.525 and OAR § 860-012-0001, the Eugene Water & Electric Board ("EWEB") hereby submits this Petition to Intervene in the above-captioned proceeding and seeks party status as provided in OAR § 860-011-0035(7). 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 Resources Projects Manager
Eugene Water & Electric Board
500 East Forth Ave.
P.O. Box 10148
Eugene Oregon 97440-2148
541-484-2411
541-341-1889 (fax)
ken.beeson@eweb.eugene.or.us

Larry Cable, Ed Finklea and Chad Stokes 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
Ed Finklea
Chad Stokes
Cable Huston Benedict Haagensen & Lloyd LLP
1001 SW Fifth Avenue, Suite 2000
Portland, OR 97204-1136

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2. EWEB is a municipal utility organized under the City of Eugene Charter and the

Constitution and laws of the State of Oregon. EWEB, PGE and PacifiCorp are co-owners of the

Trojan Nuclear Project ("Trojan").

3. PGE filed a request with the Oregon Public Utility Commission ("OPUC" or

"Commission") to revise its general rates on March 15, 2006. In its filing, PGE has proposed to

reduce annual contributions to the Nuclear Decommissioning Trust ("NDT"). PGE has also

proposed to refund ratepayer contributions from the NDT. As a co-owner of Trojan, PGE's

proposal will have a direct and substantial impact on EWEB.

4. For the reasons stated above, EWEB has a direct and substantial interest in this

proceeding that will not be adequately represented by any other party. EWEB has a substantial

interest in ensuring that PGE has sufficient funds in the NDT to satisfy its Trojan related

obligations.

5. 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.

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

DATED: May 9, 2006.

Respectfully submitted,

J. Laurence Cable, OSB #71035

Chad Stokes, OSB #00400

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Of Attorneys for the

Eugene Water & Electric Board

#### **CERTIFICATE OF SERVICE**

I CERTIFY that I have on this day served the foregoing document **EUGENE WATER** & **ELECTRIC BOARD PETITION TO INTERVENE** upon all parties by routing a copy via electronic mail and/or by mailing a copy properly addressed with first class postage prepaid to each party indicated on the current service list maintained by the Oregon Public Utility Commission in this proceeding.

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Dated in Portland, Oregon, this 9th day of May, 2006.

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