# CABLE HUSTON BENEDICT HAAGENSEN & LLOYD LLP

ATTORNEYS AT LAW
SUITE 2000
1001 SW FIFTH AVENUE
PORTLAND, OREGON 97204-1136

TELEPHONE (503) 224-3092 FACSIMILE (503) 224-3176

CHAD M. STOKES

cstokes@chbh.com www.cablehuston.com

April 3, 2006

VIA ELECTRONIC FILING AND FIRST CLASS MAIL

Oregon Public Utility Commission Attention: Filing Center P.O. Box 2148 Salem, OR 97308-2148

Re: In the Matter of Portland General Electric Company

Request for a General Rate Revision

OPUC Docket No. UE 180

Attention Filing Center:

Enclosed for filing in the above-captioned docket is the original and one (1) copy of SP Newsprint Co.'s Petition to Intervene. This document is also being filed by electronic mail with the Filing Center.

Thank you for your assistance.

Very truly yours,

Chad M. Stokes

CMS:rls Enclosure

cc w/ enc:

UE 180 Service List

SP Newsprint Co.

### BEFORE THE PUBLIC UTILITY COMMISSION

#### **OF OREGON**

**UE 180** 

In the Matter of	)	
	)	SP NEWSPRINT CO. PETITION TO
PORTLAND GENERAL ELECTRIC	)	INTERVENE
COMPANY	)	
	)	
Request for a General Rate Revision	)	
	Ś	

Pursuant to ORS § 756.525 and OAR § 860-012-0001, SP Newsprint Co. ("SP Newsprint") 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, SP Newsprint states as follows:

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

Ed Smith SP Newsprint Co. 245 Peachtree Center Ave., N.E., Suite 1800 Atlanta, GA 30303 Telephone: (404) 979-6600 E-Mail: ed.smith@spnewsprint.com

Tamara Faucette and Chad Stokes will represent SP Newsprint in this proceeding. All documents related to this proceeding should be served on SP Newsprint's attorneys at the following address:

Tamara Faucette
Chad M. Stokes
Cable Huston Benedict Haagensen & Lloyd LLP
1001 SW Fifth Ave., Suite 2000
Portland, OR 97204-1136
Telephone: (503) 224-3092
Facsimile: (503) 224-3176
E-Mail: tfaucette@chbh.com
cstokes@chbh.com

2. SP Newsprint operates a mill in Newberg, Oregon involved in the newsprint and

recycling business. SP Newsprint is a partial requirements customer taking service from

Portland General Electric Company ("PGE") under Schedule 75, a schedule developed for large

customers with on-site generation.

3. PGE filed a request with the Commission to revise its general rates on March 15, 2006.

In its filing, PGE has proposed significant revisions to the partial requirements tariffs that will

have a direct and substantial impact on SP Newsprint.

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

proceeding that will not be adequately represented by any other party.

5. SP Newsprint'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, SP Newsprint respectfully requests leave to intervene and requests all the

rights of a party in this proceeding.

DATED: April 3, 2006

Respectfully submitted,

Tamara Faucette, OSB # 95441

Chad M. Stokes, OSB # 00400

Cable Huston Benedict Haagensen & Lloyd LLP

1001 SW Fifth Ave., Suite 2000

Portland, OR 97204-1136

Telephone: (503) 224-3092

Facsimile: (503) 224-3176

E-Mail: tfaucette@chbh.com

cstokes@chbh.com

Of Attorneys for SP Newsprint Co.

## CERTIFICATE OF SERVICE

I CERTIFY that I have on this day served the foregoing document SP NEWSPRINT CO.

PETITION TO INTERVENE upon all parties of record in this proceeding by delivering a copy in person or by mailing a copy properly addressed with first class postage prepaid.

**BOEHM KURTZ & LOWRY** 

KURT J BOEHM ATTORNEY 36 E SEVENTH ST - STE 1510 CINCINNATI OH 45202 kboehm@bkllawfirm.com

**BOEHM, KURTZ & LOWRY** 

MICHAEL L KURTZ

36 E 7TH ST STE 1510 CINCINNATI OH 45202-4454 mkurtz@bkllawfirm.com

**BONNEVILLE POWER ADMINISTRATION** 

GEOFFREY M KRONICK LC7

PO BOX 3621 PORTLAND OR 97208-3621 gmkronick@bpa.gov

CRAIG SMITH

PO BOX 3621--L7 PORTLAND OR 97208-3621

cmsmith@bpa.gov

**BRUBAKER & ASSOCIATES, INC.** 

JAMES T SELECKY

1215 FERN RIDGE PKWY, SUITE 208

ST. LOUIS MO 63141 jtselecky@consultbai.com

CITIZENS' UTILITY BOARD OF OREGON

LOWREY R BROWN (Q)

610 SW BROADWAY - STE 308 PORTLAND OR 97205

lowrey@oregoncub.org

dockets@oregoncub.org

JASON EISDORFER (Q)

610 SW BROADWAY STE 308 PORTLAND OR 97205

DAVISON VAN CLEVE PC

S BRADLEY VAN CLEVE (Q)

333 SW TAYLOR - STE 400 PORTLAND OR 97204

mail@dvclaw.com

DEPARTMENT OF JUSTICE

STEPHANIE S ANDRUS (Q)
ASSISTANT ATTORNEY GENERAL

REGULATED UTILITY & BUSINESS SECTION 1162 COURT ST NE

SALEM OR 97301-4096 stephanie.andrus@state.or.us

#### **PORTLAND GENERAL ELECTRIC**

RATES & REGULATORY AFFAIRS

RATES & REGULATORY AFFAIRS 121 SW SALMON ST 1WTC0702 PORTLAND OR 97204 pge.opuc.filings@pgn.com

DOUGLAS C TINGEY

121 SW SALMON 1WTC13 PORTLAND OR 97204 doug.tingey@pgn.com

I have also served copies of the foregoing SP NEWSPRINT CO. PETITION TO INTERVENE in this proceeding by routing a copy via electronic mail to each party indicated on the current service list maintained by the Oregon Public Utility Commission in this proceeding.

Dated in Portland, Oregon, this 3rd day of April, 2006.

Tamara Faucette, OSB # 95441 Chad M. Stokes OSB #00400

Cable Huston Benedict Haagensen & Lloyd LLP

1001 SW Fifth Ave., Suite 2000

Portland, OR 97204-1136

Telephone: (503) 224-3092 Facsimile: (503) 224-3176

E-Mail: tfaucette@chbh.com

cstokes@chbh.com

Of Attorneys for SP Newsprint Co.