

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1271

In the Matter of)	
)	
PORTLAND GENERAL ELECTRIC)	
COMPANY,)	PETITION TO INTERVENE OF THE
)	INDUSTRIAL CUSTOMERS OF
Application for Deferred Accounting of Certain)	NORTHWEST UTILITIES
Revenue Refunds Associated with Senate Bill)	
408.		

Pursuant to ORS § 756.525 and OAR § 860-012-0001, the Industrial Customers of Northwest Utilities (“ICNU”) petitions the Oregon Public Utility Commission (“OPUC” or the “Commission”) to intervene in this proceeding with full party status as described in OAR § 860-011-0035(7). In support of this petition, ICNU represents as follows:

1. The business address of ICNU is:

Michael Early
Industrial Customers of Northwest Utilities
333 S.W. Taylor, Suite 400
Portland, OR 97204

2. ICNU will be represented in this proceeding by Davison Van Cleve, P.C.

All documents relating to these proceedings should be served on ICNU’s attorney at the following address:

Melinda J. Davison
Matthew W. Perkins
Davison Van Cleve, P.C.
333 S.W. Taylor, Suite 400
Portland, OR 97204
E-Mail: mail@dvclaw.com
Telephone: 503-241-7242
Facsimile: 503-241-8160

3. ICNU is an incorporated, non-profit association of large industrial electric customers in the Pacific Northwest, with offices in Portland, Oregon. A list of ICNU members is included as Attachment A. Many members of ICNU are customers of Portland General Electric Company (“PGE” or the “Company”) as indicated on Attachment A.

4. ICNU has a substantial interest in the outcome of this proceeding. PGE seeks to defer potential customer refunds associated with SB 408 as a result of the sale of a simple cycle turbine and transformer purchased by Portland General Resource Development in 2001. According to PGE, a deferred account would allow PGE to track and preserve the tax effect of the asset sale for later incorporation in rates through an amortization schedule. In its Application, PGE proposes two deferral methods: (1) deferral of the revenue refund associated with SB 408 as a result of the sale of the asset; or (2) deferral of the tax effect of the loss on the sale of the asset for later inclusion as a utility expense. PGE estimates the deferral amount to be as high as \$4.2 million and requests deferral to include the tax effect of the asset sale in rates. Therefore, any Commission decision regarding the treatment of these costs could have an impact on the rates for service that PGE provides to ICNU’s members.

5. ICNU represents the interests of many of PGE’s largest customers and has participated in many proceedings before the Commission involving PGE. ICNU’s intervention in this proceeding will assist the Commission in resolving the issues, and will not unreasonably burden the record, delay the proceedings, or broaden the issues.

6. As described above, ICNU has a direct and substantial interest in this proceeding that will not be adequately represented by any other party, and may be affected by

any Commission determination made in connection with the Application. It is in the public interest to allow ICNU to intervene in this proceeding.

WHEREFORE, ICNU respectfully requests that the Commission grant this Petition to Intervene ordering full party status for ICNU in this proceeding.

Dated this 16th day of August, 2006.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Melinda J. Davison

Melinda J. Davison

Allen C. Chan

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Of Attorneys for Industrial Customers of Northwest
Utilities

ATTACHMENT A
INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

Air Liquide
Air Products
BPB Gypsum, Inc.
Blue Heron Paper Company*
Boeing*
Boise Cascade*
CNC Containers, Northwest
Chemi-Con Materials Corporation
Dyno Nobel, Inc.
ConAgra Foods
Eka Chemicals, Inc.
Evanite Fiber
Georgia-Pacific
Grays Harbor Paper, L.P.
Hewlett-Packard
Inland Empire Paper Co.
Intel*
J.R. Simplot
Kimberly-Clark Corporation
Longview Fibre
Microsoft Corporation
Norpac Foods*
Noveon Kalama, Inc.
Oregon Steel Mills*
PCC Structural, Inc.*
Ponderay Newsprint Co
Shell Oil Products US
Simpson Paper
Simpson Timber
Solar Grade Silicon LLC
Tesoro Refining and Marketing Co.
Wah Chang
West Linn Paper Company*
Weyerhaeuser*

**Denotes PGE Customers*

Davison Van Cleve PC

Attorneys at Law

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Portland, OR 97204

August 16, 2006

Via Electronic and U.S. Mail

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

Re: In the Matter of PORTLAND GENERAL ELECTRIC COMPANY Application
for Deferred Accounting of Certain Revenue Refunds Associated with Senate Bill
408
Docket No. UM 1271

Dear Filing Center:

Enclosed please find the original and two copies of the Petition to Intervene on behalf of the Industrial Customers of Northwest Utilities in the above-referenced matter.

Please return one file-stamped copy in the postage-prepaid envelope provided.
Thank you for your assistance.

Sincerely,

/s/ Esther L. Westbrook
Esther L. Westbrook

Enclosures
cc: Service List

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing Petition to Intervene of the Industrial Customers of Northwest Utilities upon the parties on the service list, by causing the same to be deposited in the U.S. Mail, postage-prepaid.

Dated at Portland, Oregon, this 16th day of August, 2006.

/s/ Esther L. Westbrook
Esther L. Westbrook

CITIZENS' UTILITY BOARD OF OREGON
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