### BEFORE THE PUBLIC UTILITY COMMISSION

#### **OF OREGON**

#### **UE 188**

In the Matter of	)	
	)	PETITION TO INTERVENE OF THE
PORTLAND GENERAL ELECTRIC	)	INDUSTRIAL CUSTOMERS OF
COMPANY	)	NORTHWEST UTILITIES
	)	
Request for General Rate Revision.	)	

Pursuant to ORS § 756.525 and OAR § 860-012-0001, the Industrial Customers of Northwest Utilities ("ICNU") hereby petitions the Oregon Public Utility Commission ("Commission") to intervene in this proceeding with full party status as described in OAR § 860-011-0035(5). 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 attorneys and consultant at the following addresses:

S. Bradley Van Cleve Randall Falkenberg
Matthew W. Perkins RFI Consulting
Davison Van Cleve, P.C. PMB 362
333 S.W. Taylor, Suite 400
Portland, OR 97204
8351 Roswell Rd.
Atlanta, GA 30350

E-Mail: mail@dvclaw.com E-Mail: consultrfi@aol.com Telephone: (503) 241-7242 Telephone: (770) 379-0505

Facsimile: (503) 241-8160

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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"), as indicated on Attachment A.

4. ICNU has a substantial interest in the impacts of PGE's application for

revised tariffs. The proposed rate change would substantially and directly affect those of

ICNU's members who purchase power from PGE. ICNU requests leave to intervene in this

Docket to represent its members who are affected by the proposed rate increase.

5. ICNU represents the interests of many of PGE's largest customers. ICNU

participated in PGE's most recent general rate case, Docket No. UE 180, as well as numerous

other proceedings that affected PGE's rates. ICNU's intervention in this proceeding will assist

the Commission in resolving the issues in this proceeding and will not unreasonably broaden the

issues, burden the record, or unreasonably delay this proceeding.

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 these proceedings. It is in the public

interest to allow ICNU to intervene in this proceeding.

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WHEREFORE, ICNU respectfully requests that the Commission grant its petition to intervene with full party status in this proceeding.

Dated this 19th day of March, 2007.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

# /s/ Matthew Perkins

S. Bradley Van Cleve Matthew W. Perkins 333 S.W. Taylor, Suite 400 Portland, Oregon 97204 (503) 241-7242 phone (503) 241-8160 facsimile mail@dvclaw.com Of Attorneys for the Industrial Customers of Northwest Utilities

# ATTACHMENT A INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

Air Liquide

Air Products

Amcor PET Packaging USA, Inc.

BPB Gypsum, Inc.

\*Blue Heron Paper Company

\*Boeing

\*Boise Cascade

Chemi-Con Materials Corporation

Dyno Nobel, Inc.

ConAgra Foods

Eka Chemicals, Inc.

Emerald Kalama Chemical, LLC

**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

\*Oregon Steel Mills

\*PCC Structurals, Inc.

Ponderay Newsprint Co

Shell Oil Products US

Simpson Paper

Simpson Timber

Solar Grade Silicon LLC

\*SP Newsprint

Tesoro Refining and Marketing Co.

Wah Chang

\*West Linn Paper Company

\*Weyerhaeuser

<sup>\*</sup>Denotes PGE Customers

#### BEFORE THE PUBLIC UTILITY COMMISSION

#### **OF OREGON**

#### **UE 188**

In the Matter of	)	
	)	NOTICE OF INTENT TO REQUEST
PORTLAND GENERAL ELECTRIC	)	AN ISSUE FUND GRANT OF THE
COMPANY	)	INDUSTRIAL CUSTOMERS OF
	)	NORTHWEST UTILITIES
Request for a General Rate Revision.	)	

The Industrial Customers of Northwest Utilities ("ICNU") files this Notice of Intent to Request an Issue Fund Grant in UE 188, pursuant to OAR § 860-017-0050 and the Intervenor Funding Agreement ("IFA") approved by the Oregon Public Utility Commission ("Commission") in Order No. 03-388 (July 2, 2003).

- 1. Portland General Electric Company ("PGE" or the "Company") has filed a request for a general rate increase in the Company's Oregon annual revenues. The Commission will decide on the application in Docket No. UE 188.
- 2. UE 188 is an Eligible Proceeding under the IFA. The IFA defines an Eligible Proceeding as "any Commission proceeding that directly affects one or more of the Participating Public Utilities." IFA, Section 1(c). UE 188 will directly affect PGE, which is a Participating Public Utility under Section 1(k) of the IFA. Therefore, an Issue Fund Grant may be made for this proceeding under Section 6.1 the IFA.
- 3. As required by Section 6.2 of the IFA, this Notice of Intent is being filed at the time ICNU is requesting intervention in UE 188.

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4. As required by IFA Section 6.2, this Notice of Intent is being served on

each affected Participating Public Utility, all precertified organizations, and all parties identified

on the service list from UE 188.

5. ICNU identifies the PGE Issue Fund Account as the account from which

ICNU intends to request the Issue Fund Grant.

6. ICNU has been precertified under Sections 5.1 and 5.2 of the IFA and

OAR § 860-017-0050(3), as eligible to receive an Issue Fund Grant, by Commission Order No.

03-502, which was entered on August 21, 2003.

7. ICNU requests that the Commission establish a deadline by which ICNU

must file a proposed budget with respect to the Issue Fund Grant, as provided in Section 6.3 of

the IFA.

Dated this 19th day of March, 2007.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Matthew Perkins

S. Bradley Van Cleve

Matthew W. Perkins

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Of Attorneys for the Industrial Customers

of Northwest Utilities

PAGE 2 – NOTICE OF INTENT TO REQUEST AN ISSUE FUND GRANT OF ICNU

Telephone: (503) 241-7242

# Davison Van Cleve PC

# Attorneys at Law

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March 19, 2007

#### 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

Request for a General Rate Revision

Docket No. UE 188

Dear Filing Center:

Enclosed please find an original and one copy each of the Petition to Intervene and the Notice of Intent to Request an Issue Fund Grant on behalf of the Industrial Customers of Northwest Utilities in the above-captioned docket.

Please call me at (503) 241-7242 if you have any questions. Thank you for your assistance.

Sincerely yours,

/s/ Christian Griffen Christian W. Griffen

Enclosures

Service List cc:

#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have this day served the foregoing Petition to

Intervene and Notice of Intent of the Industrial Customers of Northwest Utilities upon the parties
on the official service list by causing the same to be served via electronic and USPS mail.

Dated at Portland, Oregon, this 19th day of March, 2007.

/s/ Christian Griffen Christian W. Griffen

CITIZENS' UTILITY BOARD OF OREGON

JASON EISDORFER LOWREY BROWN ROBERT JENKS 610 SW BROADWAY - STE 308 PORTLAND OR 97205 jason@oregoncub.org lowrey@oregoncub.org bob@oregoncub.org

PORTLAND GENERAL ELECTRIC

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

**PUBLIC UTILITY COMMISSION** 

JUDY JOHNSON PO BOX 2148 SALEM OR 97308-2148 judy.johnson@state.or.us **DEPARTMENT OF JUSTICE** 

STEPHANIE S ANDRUS ASSISTANT ATTORNEY GENERAL REGULATED UTILITY & BUSINESS SECTION 1162 COURT ST NE SALEM OR 97301-4096 stephanie.andrus@state.or.us

PORTLAND GENERAL ELECTRIC

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