

Rates and Regulatory Affairs
Facsimile: 503.721.2532



May 8, 2007

***VIA ELECTRONIC FILING
AND FIRST CLASS MAIL***

Oregon Public Utility Commission
Attn: Filing Center
550 Capitol Street NE, Suite 215
PO Box 2148
Salem, Oregon 97301-2148

Re: **DOCKET UE 189: In the Matter of Portland General Electric
Company's Request to Add Schedule 111, Advanced Metering
Infrastructure (AMI)**

Petition to Intervene of NW Natural

Enclosed please find NW Natural's Petition to Intervene in the above-referenced docket.

Please contact me if you have any questions.

Sincerely,

/s/ Inara Scott

Inara K. Scott
Manager, Regulatory Affairs

enclosures

cc: UE 189 Service List

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UE 189

| | | |
|---|---|---------------------------------------|
| In the Matter of |) | |
| |) | |
| PORTLAND GENERAL ELECTRIC COMPANY |) | NW NATURAL'S PETITION TO INTERVENE |
| |) | |
| Request to Add Schedule 111, Advanced Metering Infrastructure (AMI). |) | |

Pursuant to ORS 756.525 and OAR 860-13-0021, Northwest Natural Gas Company (“NW Natural”) petitions to intervene in this proceeding. In support of this petition, NW Natural states:

1.

NW Natural is a natural gas utility located in the state of Oregon and is subject to the supervision and regulation of the Public Utility Commission of Oregon (“the Commission”).

2.

Communications to NW Natural concerning this proceeding should be addressed to:

Inara K. Scott
Manager, Regulatory Affairs
NW Natural
220 NW 2nd Avenue
Portland, OR 97209
Telephone (503) 721-2476
Fax (503) 721-2532
inara.scott@nwnatural.com

Rates & Regulatory Affairs
NW Natural
220 NW 2nd Avenue
Portland, OR 97209
efiling@nwnatural.com

3.

NW Natural's interest in this proceeding is that a portion of its service territory (the "Joint Territory") overlaps with Portland General Electric (PGE). In the Joint Territory, PGE and NW Natural divide meter reading duties. If PGE implements advanced metering infrastructure, it will no longer share meter reading duties with NW Natural in the Joint Territory. Consequently, the outcome of this docket could have a significant financial impact on NW Natural. No other party is capable of adequately representing NW Natural's interests. NW Natural does not raise specific issues at this time, but reserves the right to raise issues as the case develops

4.

NW Natural's participation in this proceeding will assist the Commission in resolving the issues before it and will not unreasonably broaden the issues, burden the record or unreasonably delay the proceedings. No other party can adequately represent NW Natural's interests in this proceeding.

5.

NW Natural waives paper service of documents in this proceeding.

WHEREFORE, NW Natural respectfully requests that the Commission grant this petition to intervene.

DATED: May 8, 2007.

NORTHWEST NATURAL GAS COMPANY

/s/ Inara Scott
Inara K. Scott
Manager, Regulatory Affairs



CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of May, 2007, I served the foregoing NORTHWEST NATURAL'S PETITION TO INTERVENE in OPUC Docket No. UE 189 upon all parties on the service list in this docket by electronic mail and by first class mail.

/s/ Kelley C. Miller
Kelley C. Miller, Staff Assistant
Rates & Regulatory Affairs
NW NATURAL
220 NW 2nd Avenue
Portland, Oregon 97209-3991
1.503.226.4211, extension 3589

OPUC DOCKET NO. UE 189
Official Service List

W = Waive Paper Service
C = Confidential

Table with 2 columns and 5 rows listing contact information for various individuals including Lowrey R. Brown, Jason Eisdorfer, Robert Jenks, Jim Abrahamson, Matthew W. Perkins, S. Bradley Van Cleve, Stephanie S. Andrus, and Janet L. Prewitt.

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|--|--|
| <p>Robin Straughan (W, C) Oregon Department of Energy 625 Marion St NE Salem OR 97301-3742 robin.straughan@state.or.us</p> | <p>Lisa C. Schwartz (C) Senior Analyst Oregon Public Utility Commission PO Box 2148 Salem OR 97308-2148 lisa.c.schwartz@state.or.us</p> |
| <p>Mark Tucker (W) Regulatory Analyst Pacific Power & Light 825 NE Multnomah St, Ste 2000 Portland OR 97232 mark.tucker@pacificcorp.com</p> | <p>Oregon Dockets (W) PacifiCorp 825 NE Multnomah, Ste 2000 Portland OR 97232 oregondockets@pacificcorp.com</p> |
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