

BOEHM, KURTZ & LOWRY

ATTORNEYS AT LAW
36 EAST SEVENTH STREET
SUITE 1510
CINCINNATI, OHIO 45202
TELEPHONE (513) 421-2255
TELECOPIER (513) 421-2764

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Public Utility Commission of Oregon
Administrative Hearing Division

Via Electronic Mail puc.filingcenter@state.or.us
And Overnight Mail

March 18, 2008

Public Utility Commission of Oregon
550 Capitol Street NE, Suite 215
Salem, Oregon 97310
Attn: Carol Hulse

Re: Case No. UE-197

Dear Ms. Hulse:

Please find enclosed the original and five (5) copies of the PETITION TO INTERVENE OF THE FRED MEYERS STORES AND QUALITY FOOD CENTERS, DIVISIONS OF KROGER CO. in the above referenced matter.

Copies have been served on all parties of record. Please place this document of file.

Very truly yours,



Michael L. Kurtz, Esq.
Kurt J. Boehm, Esq.
BOEHM, KURTZ & LOWRY

MLKkew
Enclosure
cc: Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that true copy of the foregoing was served via electronic mail (when available) and regular U.S. Mail (unless otherwise noted), this 18th day of March, 2008.

CITIZENS' UTILITY BOARD OF OREGON

LOWREY R BROWN (C)
UTILITY ANALYST

610 SW BROADWAY - STE 308
PORTLAND OR 97205
lowrey@oregoncub.org

JASON EISDORFER (C)
ENERGY PROGRAM DIRECTOR

610 SW BROADWAY STE 308
PORTLAND OR 97205
jason@oregoncub.org

ROBERT JENKS (C)

610 SW BROADWAY STE 308
PORTLAND OR 97205
bob@oregoncub.org

DAVISON VAN CLEVE PC

S BRADLEY VAN CLEVE (C)

333 SW TAYLOR - STE 400
PORTLAND OR 97204
mail@dvclaw.com

DEPARTMENT OF JUSTICE

STEPHANIE S ANDRUS (C)
ASSISTANT ATTORNEY GENERAL

REGULATED UTILITY &
BUSINESS SECTION
1162 COURT ST NE
SALEM OR 97301-4096
stephanie.andrus@state.or.us

PORTLAND GENERAL ELECTRIC

PATRICK HAGER RATES &
REGULATORY AFFAIRS (C)

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

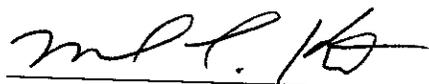
DOUGLAS C TINGEY (C)
ASST GENERAL COUNSEL

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

RFI CONSULTING INC

RANDALL J FALKENBERG

PMB 362
8343 ROSWELL RD
SANDY SPRINGS GA 30350
consultrfi@aol.com



Michael L. Kurtz, Esq.
Kurt J. Boehm, Esq.

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 197

In The Matter Of
Portland General Electric Company General

PETITION TO INTERVENE OF
FRED MEYER STORES AND
QUALITY FOOD CENTERS,
DIVISIONS OF KROGER CO.

Application for general rate increase

NAME OF PETITIONER: **Fred Meyer Stores and Quality Food Centers, Divisions Of Kroger Co.**
ADDRESS: **Attn: Corporate Energy Manager, 1014 Vine Street, Cincinnati, Ohio 45202**
PHONE NUMBER: **513-762-4538**
FAX NUMBER: **513-762-4012**
E-MAIL ADDRESS: **dgeorge@kroger.com**

NAME OF COUNSEL FOR PETITIONER: **Michael L. Kurtz, Esq., and Kurt J. Boehm, Esq., Boehm, Kurtz & Lowry**
COUNSEL'S ADDRESS: **36 East Seventh Street., Suite 1510, Cincinnati, OH 45202**
COUNSEL'S PHONE NUMBER: **513-421-2255**
COUNSEL'S FAX NUMBER: **513-421-2764**
COUNSEL'S E-MAIL ADDRESS: **mkurtz@bkllawfirm.com, kboehm@bkllawfirm.com**

NAME OF CONSULTANT FOR PETITIONER: **Kevin C. Higgins, Energy Strategies Inc.**
CONSULTANT'S ADDRESS: **215 South State Street, Suite 200, Salt Lake City, UT 84111**
CONSULTANT'S PHONE NUMBER: **801-355-4365**
CONSULTANT'S FAX NUMBER: **801-521-9142**
CONSULTANT'S E-MAIL ADDRESS: **khiggins@energystrat.com**

IF THE PETITIONER IS AN ORGANIZATION, THE NUMBER OF MEMBERS IN AND THE PURPOSES OF THE ORGANIZATION:

The Petitioner is seeking intervention on its own behalf as a customer of Portland General Electric Company. Petitioner is not seeking intervention in this matter as a member of a trade group or other organization.

NATURE AND EXTENT OF THE PETITIONER'S INTEREST IN THE PROCEEDING:

Petitioner operates approximately 36 grocery stores, convenience stores, warehouses, office, and manufacturing operations in the service territory of Portland General. The total load of Petitioner is approximately 32 MW. The annual load factor by location varies but averages in the range of 65-70%. Petitioner has a substantial and diverse interest in the outcome of this case that cannot be adequately represented by any other party.

THE ISSUES THE PETITIONER INTENDS TO RAISE AT THE PROCEEDING:

The primary issue Fred Meyer intends to address in this case will be whether the rate increase sought by the Applicant is reasonable and cost justified. We also intend to address whether the proposed allocation of the rate increase and the design of the new rates are just and reasonable.

ANY SPECIAL KNOWLEDGE OR EXPERTISE OF THE PETITIONER THAT WOULD ASSIST THE COMMISSION IN RESOLVING THE ISSUES IN THE PROCEEDING:

Kroger Co., the owner of Fred Meyer Stores and Quality Food Centers, operates in 31 states and has approximately 3500 locations nationwide. Petitioner's regulatory counsel has extensive experience in all facets of electricity law. We expect to retain expert witnesses as necessary. This broad familiarity with ratemaking policy gives Petitioner special expertise that will assist the Commission in deciding the issues in this proceeding.

Based on the information provided above in accordance with the Commission's rules of procedure, Fred Meyer Stores and Quality Food Centers requests to participate in this proceeding as an intervenor. Petitioner represents that it will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding. OAR 860-013-0021.

Michael L. Kurtz, Esq.
Kurt J. Boehm, Esq.
BOEHM, KURTZ & LOWRY
36 East Seventh Street, Suite 1510
Cincinnati, Ohio 45202
Ph: 513-421-2255
Fax: 513-421-2764
e-mail: mkurtz@bkllawfirm.com
e-mail: kboehm@bkllawfirm.com

Date