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October 17, 2008

Via Electronic and US Mail

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

Re: Open an investigation into electric companies providing Qualified Reporting Entity services for certification of renewable energy certificates by the Western Renewable Energy Generation Information System
Docket No. UM 1394

Dear Filing Center:

Enclosed please find an original and one copy of the Petition to Intervene on behalf of the Industrial Customers of Northwest Utilities in the above-referenced docket.

Thank you for your assistance.

Sincerely yours,

/s/ Brendan E. Levenick
Brendan E. Levenick

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, shown below, by causing the same to be sent by electronic mail to all parties, as well as, deposited in the U.S. Mail, postage-prepaid, to parties which have not waived paper service.

Dated at Portland, Oregon, this 17th day of October, 2008.

/s/ Brendan E. Levenick
Brendan E. Levenick

DEPARTMENT OF JUSTICE
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**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1394

In the Matter of)	
)	
THE PUBLIC UTILITY COMMISSION OF)	
OREGON)	PETITION TO INTERVENE OF THE
)	INDUSTRIAL CUSTOMERS OF
Open an investigation into electric companies)	NORTHWEST UTILITIES
providing Qualified Reporting Entity services for)	
certification of renewable energy certificates by)	
the Western Renewable Energy Generation)	
<u>Information System</u>)	

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 attorneys and consultant at the following addresses:

Melinda J. Davison
Irion A. Sanger
Davison Van Cleve, P.C.
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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.

4. ICNU has a substantial interest in the outcome of this proceeding. ICNU represents the interests of many large industrial ratepayers that may be affected by the Commission's investigation into the appropriate method. The Commission's decision in this proceeding could have an impact on the rates or service to ICNU's members.

5. ICNU has participated in many Commission proceedings regarding renewable resources, including but not limited to AR 511, AR 521, UM 1147, UM 1169, UM 1331, UE 200 and UE 188. 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. 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 17th day of October, 2008.

Sincerely yours,

DAVISON VAN CLEVE, P.C.

/s/ Irion A. Sanger

Irion A. Sanger

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Portland, OR 97204

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Of Attorneys for Industrial Customers of Northwest
Utilities

ATTACHMENT A

INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

Air Liquide
Air Products
Amcor PET Packaging USA, Inc. (CNC Containers Northwest)
Certain Teed Gypsum & Ceiling Manufacturing, Inc. (BPB)
Blue Heron Paper Company
Boeing
Boise Paper
ConAgra Foods
Dyno Nobel, Inc.
Eka Chemicals, Inc.
Emerald Performance Materials, LLC
Equa-Chlor, LLC
Evanite Fiber
Evraz Oregon Steel Mills
Georgia-Pacific
Grays Harbor Paper, L.P.
Hewlett-Packard
Inland Empire Paper Co.
Intel
International Paper
J.R. Simplot
Kimberly-Clark Corporation
Linde, Inc.
Longview Fibre
Microsoft Corporation
Norpac Foods
PCC Structurals, Inc.
Ponderay Newsprint
REC Solar Grade Silicon LLC
Shell Oil Products US
Simpson Paper & Timber
SP Newsprint
Tesoro Refining and Marketing Co.
Wah Chang
West Linn Paper Company
Weyerhaeuser