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December 2, 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: Request to Open an Investigation into Interconnection of PURPA Qualifying
Facilities with a Nameplate Capacity Larger than 10 Megawatts to a Public
Utility's Transmission or Distribution System
Docket No. UM 1401

Dear Filing Center:

Enclosed please find an original 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 2nd day of December, 2008.

/s/ Brendan E. Levenick
Brendan E. Levenick

<p>DEPARTMENT OF JUSTICE MICHAEL T WEIRICH ASSISTANT ATTORNEY GENERAL REGULATED UTILITY & BUSINESS SECTION 1162 COURT ST NE SALEM OR 97301-4096 michael.weirich@doj.state.or.us</p>	<p>OREGON PUBLIC UTILITY COMMISSION LISA SCHWARTZ PO BOX 2148 SALEM OR 97308-2148 lisa.c.schwartz@state.or.us</p>
<p>(W) CITIZEN'S UTILITY BOARD OF OREGON G. CATRIONA MCCrackEN ROBERT T. JENKS 610 SW BROADWAY - STE 308 PORTLAND OR 97205 catriona@oregoncub.org bob@oregoncub.org</p>	<p>(W) IDAHO POWER COMPANY RANDY ALLPHIN DAVE ANGELL CHRISTA BEARRY BARTON L KLINE LISA D NORDSTROM MIKE YOUNGBLOOD BOX 70 BOISE ID 83707-0070 rallphin@idahopower.com daveangell@idahopower.com cbearry@idahopower.com bkline@idahopower.com lnordstrom@idahopower.com myoungblood@idahopower.com</p>
<p>(W) LOVINGER KAUFMANN LLP JEFFREY S LOVINGER 825 NE MULTNOMAH STE 925 PORTLAND OR 97232-2150 lovinger@lklaw.com</p>	<p>(W) MCDOWELL & RACKNER PC AMIE JAMIESON WENDY MCINDOO LISA F RACKNER 520 SW SIXTH AVE - STE 830 PORTLAND OR 97204 amie@mcd-law.com wendy@mcd-law.com lisa@mcd-law.com</p>

<p>(W) PACIFIC POWER & LIGHT JORDAN WHITE 825 NE MULTNOMAH, STE 1800 PORTLAND OR 97232 jordan.white@pacificorp.com</p>	<p>(W) PACIFICORP OREGON DOCKETS OREGON DOCKETS 825 NE MULTNOMAH ST, STE 2000 PORTLAND OR 97232 oregondockets@pacificorp.com</p>
<p>PORTLAND GENERAL ELECTRIC RANDALL DAHLGREN 121 SW SALMON ST 1WTC 0702 PORTLAND OR 97204 pge.opuc.filings@pgn.com</p>	<p>PORTLAND GENERAL ELECTRIC J RICHARD GEORGE 121 SW SALMON ST 1WTC1301 PORTLAND OR 97204 richard.george@pgn.com</p>

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1401

In the Matter of)	
)	
PUBLIC UTILITY COMMISSION OF)	
OREGON)	PETITION TO INTERVENE OF THE
)	INDUSTRIAL CUSTOMERS OF
Request to Open an Investigation into)	NORTHWEST UTILITIES
Interconnection of PURPA Qualifying)	
Facilities with a Nameplate Capacity Larger)	
than 10 Megawatts to a Public Utility's)	
<u>Transmission or Distribution System</u>)	

Pursuant to ORS § 756.525 and OAR § 860-012-0001, the Industrial Customers of Northwest Utilities (“ICNU”) petitions the Public Utility Commission of Oregon (“OPUC” or the “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
Irion A. Sanger
Davison Van Cleve, P.C.
333 S.W. Taylor, Suite 400

Tom Beach
Crossborder Energy
2560 Ninth St.
Berkeley, CA 94710

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E-Mail: TomB@crossborderenergy.com
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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 of ICNU's members are customers of PacifiCorp and Portland General Electric Company ("PGE"), two investor-owned utilities that may be affected by any policies adopted in this proceeding.

4. ICNU has a substantial interest in the Commission's investigation into interconnection of PURPA qualifying facilities with a nameplate capacity larger than 10 megawatts to a public utility's transmission or distribution system. Some ICNU members have cogeneration facilities and are qualified to sell electricity to their utilities. The interconnection rules could impact the services that ICNU's members receive from their utilities and the rates that ICNU's members pay for those services. In addition, the interconnection rules could have an impact upon the ability of generators to sell power in the wholesale power market, and could indirectly impact the rates that ICNU's members pay.

5. ICNU's intervention in this proceeding will assist the Commission in resolving the issues and will not unreasonably broaden the issues, burden the record, or 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.

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

Dated this 2nd day of December, 2008.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ S. Bradley Van Cleve

S. Bradley Van Cleve

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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
Freres Lumber Co.
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