

# Davison Van Cleve PC

Attorneys at Law

TEL (503) 241-7242 • FAX (503) 241-8160 • mail@dvclaw.com  
Suite 400  
333 SW Taylor  
Portland, OR 97204

April 21, 2009

*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: In the Matter of PORTLAND GENERAL ELECTRIC COMPANY  
Schedule 122 Update to Renewable Resources Automatic Adjustment  
Clause  
**Docket No. UE 209**

Dear Filing Center:

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

Thank you for your assistance.

Sincerely,

/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 on behalf of the of the Industrial Customers of Northwest Utilities upon the parties, on the service list, by causing the same to be deposited in the U.S. Mail, postage-prepaid, and via electronic mail.

Dated at Portland, Oregon, this 21st day of April, 2009.

Sincerely,

/s/ Brendan E. Levenick  
Brendan E. Levenick

<b>PORTLAND GENERAL ELECTRIC</b> RANDALL DAHLGREN 121 SW SALMON ST 1WTC 0702 DOUGLAS C TINGEY 121 SW SALMON 1WTC13 PORTLAND OR 97204 pge.opuc.filings@pgn.com doug.tingey@pgn.com	<b>DEPARTMENT OF JUSTICE</b> MICHAEL T WEIRICH (C) ASSISTANT ATTORNEY 1162 COURT ST NE SALEM OR 97301-4096 michael.weirich@doj.state.or.us
<b>PUBLIC UTILITY COMMISSION OF OREGON</b> JUDY JOHNSON (C) PO BOX 2148 SALEM OR 97308-2148 judy.johnson@state.or.us	<b>(W) CITIZEN'S UTILITY BOARD OF OREGON</b> G. CATRIONA MCCrackEN (C) ROBERT JENKS (C) 610 SW BROADWAY - STE 308 PORTLAND OR 97205 catriona@oregoncub bob@oregoncub.org

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UE 209**

In the Matter of	)	
	)	
PORTLAND GENERAL ELECTRIC	)	PETITION TO INTERVENE OF THE
COMPANY	)	INDUSTRIAL CUSTOMERS OF
	)	NORTHWEST UTILITIES
Schedule 122 Update to Renewable	)	
<u>Resources Automatic Adjustment Clause</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 (“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 address:

S. Bradley Van Cleve  
Jesse E. Cowell  
Davison Van Cleve, P.C.  
333 S.W. Taylor, Suite 400  
Portland, OR 97204  
E-Mail: mail@dvclaw.com  
          jec@dvclaw.com  
Telephone: (503) 241-7242  
Facsimile: (503) 241-8160

Randall J. Falkenberg  
RFI Consulting, Inc.  
8343 Roswell Road  
PMB 362  
Sandy Springs, GA 30350  
E-Mail: consultrfi@aol.com  
Telephone: (770) 379-0505  
Facsimile: (770) 671-1046

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 Portland General Electric ("PGE"), as shown on Attachment A.

4. ICNU has a substantial interest in PGE's Schedule 122 Update to Renewable Resources Automatic Adjustment Clause ("Update"). PGE filed its Update on April 1, 2009. The Update proposes to increase the rates that PGE provides to ICNU's members that remain on cost of service rates.

5. ICNU has extensive experience with PGE's rates and with previous proceedings involving updates to renewable resources automatic adjustments. 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 21st day of April, 2009.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Jesse E. Cowell

S. Bradley Van Cleve

Jesse E. Cowell

333 S.W. Taylor, Suite 400

Portland, Oregon 97204

(503) 241-7242 phone

(503) 241-8160 facsimile

mail@dvclaw.com

jec@dvclaw.com

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 Cascade LLC  
\*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 Company  
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

*\*Denotes PGE Customers*