

November 25, 2009

Oregon Public Utility Commission Filing Center 550 Capitol St. NE, Suite 215 Salem, OR 97301-2551

Enclosed for filing with the Oregon Public Utility Commission in Docket LC 48 are the original and five copies of the Petition to Intervene of the Iberdrola Renewables, Inc. and Certificate of Service.

Thank you.

Kevin A. Lynch

## BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

## LC 48

In the Matter of	)	Petition to Intervene
PORTLAND GENERAL ELECTRIC CO.	)	of Iberdrola Renewables, Inc
2009 Integrated Resource Plan	)	,

Iberdrola Renewables, Inc. ("Iberdrola Renewables") hereby petitions to intervene in the above-referenced proceedings as an intervenor party pursuant to OAR 860-13-021. In support of this Petition to Intervene, Iberdrola Renewables asserts the following:

A. Iberdrola Renewables' business address is:

1125 NW Couch Street Suite 700 Portland, OR 97209

B. Iberdrola Renewables will be represented by Director of Policy and Regulation Kevin A. Lynch and Senior Counsel Toan Nguyen who are designated for service of all documents at the following address:

Kevin A. Lynch 1125 NW Couch Street, Suite 700 Portland, OR 97209 Phone: (503) 796-7108 kevin.lynch@iberdrolausa.com

Toan-Hao B. Nguyen 1125 NW Couch Street, Suite 400 Portland, OR 97209 Phone: (503) 241-3204

Toan.nguyen@iberdrolausa.com

- C. Iberdrola Renewables waives paper service.
- D. Iberdrola Renewables is an independent power producer and marketer, headquartered in Portland, OR. Iberdrola Renewables, through its affiliates, owns and operates or controls over 1,000 MW of renewable generation in the Pacific Northwest. Iberdrola Renewables, through its affiliates, also owns, operates and markets the output of the 534 MW Klamath Cogeneration combined cycle combustion turbine plant and the 104 MW Klamath Peakers plants in Klamath Falls, Oregon.
- E. As a developer, operator, and marketer of resources that may serve PGE's retail customers reliably and in a cost-effective manner, Iberdrola Renewables has an interest in this Integrated Resource Plan.

The involvement of Iberdrola Renewables will not unreasonably broaden the issues, burden the record nor delay the proceeding. For the reasons stated above, Iberdrola Renewables respectfully requests that it be allowed to intervene in this matter.

Dated this twenty-fifth day of November, 2009

Respectfully submitted,

Kevin A. Lynch

Director, Policy and Regulation

Iberdrola Renewables, Inc.

## LC 48 CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing Petition to Intervene in Portland General Electric's 2009 Integrated Resource Plan (LC48) on the following persons on November 25, 2009, by hand-delivering, e-mailing, or mailing (as indicated below) to each a copy thereof, and if mailed, contained in a sealed envelope, with postage paid, addressed to said attorneys at the last known address of each shown below and deposited in the post office on said day at Salem, Oregon:

Stephanie S Andrus	by hand-delivery
Department of Justice	by facsimile
Regulated Utility & Business Section	by first class mail by e-mail
1162 Court Street N.E.	by e-mail
Salem, Oregon 97301-4096	
,,,	
PacifiCorp Oregon Dockets	by hand-delivery
oregondockets@pacificorp.com	by facsimile
825 N.E. Multnomah, Suite 2000	by first class mail
Portland, Oregon 97232	☑ by e-mail
Susan K Ackerman	by hand-delivery
621 SW Morrison, Suite 700	by facsimile
Portland, OR 97205	by first class mail
	⊠ by e-mail
Citizens' Utility Board of Oregon	by hand-delivery
GORDON FEIGHNER	by facsimile
610 SW BROADWAY, SUITE 308	by first class mail
PORTLAND OR 97205	│ 図 by e-mail
gordon@oregoncub.org	
Citizens' Utility Board of Oregon	by hand-delivery
ROBERT JENKS	by facsimile
610 SW BROADWAY STE 308	by first class mail
PORTLAND OR 97205	☑ by e-mail
bob@oregoncub.org	
Citizens' Utility Board of Oregon	by hand-delivery
G. CATRIONA MCCRACKEN	by facsimile
LEGAL COUNSEL/STAFF ATTY	by first class mail
610 SW BROADWAY - STE 308	☑ by e-mail
PORTLAND OR 97205	
catriona@oregoncub.org	
NW INDEPENDENT POWER	by hand-delivery
PRODUCERROBERT D KAHN	by facsimile
EXECUTIVE DIRECTOR	by first class mail
1117 MINOR AVENUE, SUITE 300	☑ by e-mail
SEATTLE WA 98101	
rkahn@nippc.org	

PORTLAND GENERAL ELECTRIC PATRICK G HAGER MANAGER - REGULATORY AFFAIRS 121 SW SALMON ST 1WTC0702 PORTLAND OR 97204 patrick.hager@pgn.com	<ul> <li>□ by hand-delivery</li> <li>□ by facsimile</li> <li>⋈ by first class mail</li> <li>⋈ by e-mail</li> </ul>
PORTLAND GENERAL ELECTRIC DENISE SAUNDERS ASST GENERAL COUNSEL 121 SW SALMON ST - 1WTC1711 PORTLAND OR 97204 denise.saunders@pgn.com	<ul> <li>□ by hand-delivery</li> <li>□ by facsimile</li> <li>⋈ by first class mail</li> <li>⋈ by e-mail</li> </ul>

DATED this 25<sup>th</sup> day of November, 2009.

By:

Kevin.lynch@iberdrolausa.com Iberdrola Renewables, Inc.