

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

LC 48

In the Matter of)	
)	PETITION TO INTERVENE OF THE
PORTLAND GENERAL ELECTRIC)	INDUSTRIAL CUSTOMERS OF
COMPANY)	NORTHWEST UTILITIES
)	
<u>2009 Integrated Resource Plan</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 SW Taylor Street
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 attorney and executive director at the following addresses:

Irion Sanger
Davison Van Cleve, P.C.
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Michael Early
Industrial Customers of Northwest Utilities
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Telephone: (503) 503-239-9269
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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 Portland General Electric ("PGE"), as shown in Attachment A.

4. ICNU has a substantial interest in PGE's 2009 Integrated Resource Plan ("IRP"). Any Commission decision regarding PGE's 2009 IRP could have an impact on the rates and quality of service that PGE provides to ICNU's members.

5. ICNU represents the interests of a number of large electric customers in the State of Oregon. ICNU has participated in previous least cost proceedings before the Commission, such as PGE's Resource Policies and Plans, which was docketed as LC 33, as well as PGE's most recent IRP case, docket no. LC 43. 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 this proceeding. 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 9th day of December, 2009.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Irion Sanger

Irion Sanger

Davison Van Cleve, P.C.

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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 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*

Davison Van Cleve PC

Attorneys at Law

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December 9, 2009

Via Electronic and U.S. 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's 2009 Integrated Resource
Plan.
Docket No. LC 48

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 where paper service has been waived.

Dated at Portland, Oregon, this 9th day of December, 2009.

Sincerely,

/s/ Brendan E. Levenick
Brendan E. Levenick

<p>OREGON DEPARTMENT OF ENERGY VIJAY A SATYAL 625 MARION ST NE SALEM OR 97301 vijay.a.satyal@state.or.us</p>	<p>DEPARTMENT OF JUSTICE STEPHANIE S ANDRUS (C) 1162 COURT ST NE SALEM OR 97301-4096 stephanie.andrus@state.or.us</p>
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