

# Davison Van Cleve PC

Attorneys at Law

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Suite 400  
333 SW Taylor  
Portland, OR 97204

February 13, 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: Investigation into determination of resource sufficiency  
**Docket No. UM 1396**

Dear Filing Center:

Enclosed please find an original of the Issues List on behalf of the Industrial Customers of Northwest Utilities in the above-referenced docket.

Thank you for your assistance.

Sincerely yours,

/s/ Allison M. Wils  
Allison M. Wils

Enclosures  
cc: Service List

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have this day served the foregoing Issues List 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 13th day of February, 2009.

/s/ Allison M. Wils  
Allison M. Wils

<b>CITIZENS' UTILITY BOARD OF OREGON (W)</b> ROBERT JENKS G. CATRIONA MCCrackEN 610 SW BROADWAY STE 308 PORTLAND OR 97205 bob@oregoncub.org catriona@oregoncub.org	<b>OREGON PUBLIC UTILITY COMMISSION</b> ED DURRENBERGER PO BOX 2148 SALEM OR 97308-2148 ed.durrenberger@state.or.us
<b>MCDOWELL &amp; RACKNER PC (W)</b> WENDY MCINDOO LISA F RACKNER 520 SW 6TH AVE STE 830 PORTLAND OR 97204 wendy@mcd-law.com lisa@mcd-law.com	<b>PACIFIC POWER &amp; LIGHT (W)</b> JORDAN WHITE LEGAL COUNSEL 825 NE MULTNOMAH STE 1800 PORTLAND OR 97232 jordan.white@pacificorp.com
<b>PACIFICORP OREGON DOCKETS (W)</b> OREGON DOCKETS 825 NE MULTNOMAH ST STE 2000 PORTLAND OR 97232 oregondockets@pacificorp.com	<b>PORTLAND GENERAL ELECTRIC</b> RANDY DAHLGREN RATES & REGULATORY AFFAIRS J RICHARD GEORGE 121 SW SALMON ST 1WTC0702 PORTLAND OR 97204 pge.opuc.filings@pgn.com richard.george@pgn.com

<p><b>DEPARTMENT OF JUSTICE (W)</b>  MICHAEL T WEIRICH  JANET L PREWITT  REGULATED UTILITY &amp; BUSINESS SECTION  1162 COURT ST NE  SALEM OR 97301-4096  michael.weirich@doj.state.or.us  janet.prewitt@doj.state.or.us</p>	<p><b>ANNALA, CAREY, BAKER, ET AL., PC (W)</b>  WILL K CAREY  PO BOX 325  HOOD RIVER OR 97031  wcarey@hoodriverattorneys.com</p>
<p><b>COMMUNITY RENEWABLE ENERGY ASSOCIATION (W)</b>  PAUL R WOODIN  EXECUTIVE DIRECTOR  1113 KELLY AVE  THE DALLES OR 97058  pwoodin@communityrenewables.org</p>	<p><b>IDAHO POWER COMPANY (W)</b>  RANDY ALLPHIN  CHRISTA BEARRY  BARTON L KLINE  MICHAEL YOUNGBLOOD  PO BOX 70  BOISE ID 83707-0070  rallphin@idahopower.com  cbearry@idahopower.com  bkline@idahopower.com  myoungblood@idahopower.com</p>
<p><b>OREGON DEPARTMENT OF ENERGY (W)</b>  VIJAY A SATYAL  SENIOR POLICY ANALYST  625 MARION ST NE  SALEM OR 97301  vijay.a.satyal@state.or.us</p>	<p><b>RICHARDSON &amp; O'LEARY PLLC (W)</b>  PETER J RICHARDSON  PO BOX 7218  BOISE ID 83707  peter@richardsonandoleary.com</p>

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February 13, 2009

***Via Regular and Electronic Mail***

Patrick Power  
Administrative Law Judge  
Public Utility Commission  
550 Capitol St NE #215  
Salem, Oregon  
97308-2148

Re: Investigation into determination of resource sufficiency  
**Docket No. UM 1396**

Dear ALJ Power:

The Industrial Customers of Northwest Utilities (“ICNU”) supports the issues identified in Staff’s proposed issues list. Staff’s proposed issues list, however, does not include all the issues that ICNU intends to raise in this proceeding. ICNU identifies the following additional issues that should be addressed:

- Should the utilities’ avoided cost filings be differentiated based on their resource position?
- Do the utilities’ avoided cost methodologies accurately forecast their resource position?
- Are the utilities acquiring resources greater than 50 MWs while they are considered resource sufficient?

Sincerely yours,

/s/ Irion A. Sanger  
Irion A. Sanger

cc: UM 1396 Service List