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November 10, 2008

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 COMPANY
Request for recovery of costs associated with its Selective Water Withdrawal
Project
Docket No. UE 204

Dear Filing Center:

Enclosed please find an original and one courtesy copy of the Petition to Intervene on behalf of the Industrial Customers of Northwest Utilities, as well as Signed Protective Order 08-515 in the above-referenced docket.

Thank you for your attention to this matter.

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 and Signed Protective Order on behalf 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.

Dated at Portland, Oregon, this 10th day of November, 2008.

/s/ Brendan E. Levenick
Brendan E. Levenick

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BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UE 204

In the Matter of)
)
PORTLAND GENERAL ELECTRIC) PETITION TO INTERVENE OF THE
COMPANY) INDUSTRIAL CUSTOMERS OF
) NORTHWEST UTILITIES
)
Request for recovery of costs associated with its)
Selective Water Withdrawal Project.)
_____)

Pursuant to ORS § 756.525 and OAR § 860-012-0001, the Industrial Customers of Northwest Utilities (“ICNU”) hereby petitions the Oregon Public Utility Commission (“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 at the following addresses:

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

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 members of ICNU are customers of Portland General Electric Company (“PGE”), as indicated on Attachment A.

4. ICNU has a substantial interest in PGE’s request for recovery of costs associated with its Selective Water Withdrawal Project (“SWWP”). The proposed recovery of costs would substantially and directly affect those of ICNU’s members who purchase power from PGE. ICNU requests leave to intervene in this Docket to represent its members who are affected by the recovery of PGE’s costs associated with its SWWP.

5. ICNU represents the interests of many of PGE’s largest customers. ICNU participated in PGE’s most recent general rate case, Docket No. UE 197, as well as numerous other proceedings that affected PGE’s rates and recovery of costs. ICNU’s intervention in this proceeding will assist the Commission in resolving the issues in this proceeding and will not unreasonably broaden the issues, burden the record, or unreasonably 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 10th day of November, 2008.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ S. Bradley Van Cleve

S. Bradley Van Cleve

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Of Attorneys for the Industrial Customers of
Northwest Utilities

ATTACHMENT A
INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

Air Liquide
Air Products
Ampcor PET Packaging USA, Inc.
Certain Teed Gypsum & Ceiling Manufacturing, Inc.
*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, Inc. NA.
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 Co.
REC Solar Grade Silicon,
Shell Oil Products US
Simpson Paper & Timber
*SP Newsprint
Tesoro Refining and Marketing Co.
Wah Chang
*West Linn Paper Company
*Weyerhaeuser

**Denotes PGE Customers*