

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1182

In the Matter of)	
)	
NORTHWEST INDEPENDENT POWER)	PETITION TO INTERVENE OF THE
PRODUCERS COALITION)	INDUSTRIAL CUSTOMERS OF
)	NORTHWEST UTILITIES
Petition for an Investigation Regarding)	
Competitive Bidding.)	
_____)	

Pursuant to ORS § 756.525 and OAR § 860-013-0021, 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:

Ken Canon
Industrial Customers of Northwest Utilities
825 NE Multnomah, Suite 180
Portland, OR 97232

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 address:

S. Bradley Van Cleve
Irion Sanger
Davison Van Cleve, P.C.
333 S.W. Taylor, Suite 400
Portland, OR 97204
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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 PacifiCorp and Portland General Electric Company ("PGE"), two investor-owned utilities that may be affected by any policies adopted in this proceeding.

4. ICNU has a substantial interest in the Commission's investigation relating to competitive bidding. The Commission will investigate issues that guide utilities' resource acquisition strategies, such as whether independent monitors should be used in bidding processes, and how to evaluate the risks associated with certain bids. Any Commission finding regarding competitive bidding procedures will likely impact the rates that ICNU's members pay for their electric services.

5. ICNU represents the interests of a number of large electric customers in the State of Oregon. 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 15th day of February, 2005.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ S. Bradley Van Cleve _____

S. Bradley Van Cleve

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
BPB Gypsum, Inc.
Blue Heron Paper Company
Boeing
Boise Cascade
CNC Containers, Northwest
Chemi-Con Materials Corporation
Dyno Nobel, Inc.
ConAgra Foods
Eka Chemicals, Inc.
Evanite Fiber
Georgia-Pacific
Grays Harbor Paper, L.P.
Hewlett-Packard
Inland Empire Paper Co.
Intel
J.R. Simplot
Kimberly-Clark Corporation
Longview Fibre
Microsoft Corporation
Norpac Foods
Noveon Kalama, Inc.
Oregon Steel Mills
PCC Structurals, Inc.
Ponderay Newsprint Co.
Shell Oil Products US
Simpson Paper
Simpson Timber
Solar Grade Silicon LLC
Tesoro Refining and Marketing Co.
Wah Chang
West Linn Paper Company
Weyerhaeuser

February 15, 2005

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 Northwest Independent Power Producers Coalition Petition for an Investigation Regarding Competitive Bidding.
Docket No. UM 1182

Dear Filing Center:

Enclosed please find an original and two copies of the Petition to Intervene of the Industrial Customers of Northwest Utilities in the above-captioned Docket.

Please return one file-stamped copy of the document in the self-addressed, stamped envelope provided. Thank you for your assistance.

Sincerely yours,

/s/ Christian Griffen
Christian W. Griffen

Enclosures

cc: Service List

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing Petition to Intervene of the Industrial Customers of Northwest Utilities upon the parties listed below, listed on the official service list for UM 1182, by causing the same to be mailed, postage-prepaid, through the U.S. Mail.

Dated at Portland, Oregon, this 15th day of February, 2005.

/s/ Christian Griffen
Christian W. Griffen

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