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February 4, 2005

Via Electronic Mail and US Mail

Carole Hulse
Administrative Specialist
Oregon Public Utilities Commission
PO Box 2148
Salem, OR 97308-2148

Re: In the Matter of PORTLAND GENERAL ELECTRIC Application for
Deferral of Costs Benefits Due to Hydro Generation Variance.
Docket No. UM 1187

Dear Ms. Hulse:

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. Please call me at (503) 241-7242 if you have any questions. Thank you for your assistance.

Sincerely yours,

/s/ Ally Smith

Ally L. Smith

Enclosures

cc: Service List

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1187

In the Matter of the)	
)	
PORTLAND GENERAL ELECTRIC)	PETITION TO INTERVENE OF THE
)	INDUSTRIAL CUSTOMERS OF
Application for Deferral of Costs and Benefits)	NORTHWEST UTILITIES
Due to Hydro Generation Variance.)	
)	
_____)	

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:

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Davison Van Cleve, P.C.
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8351 Roswell Road, PMB 362
Atlanta, GA 30350
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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 Company ("PGE"), as shown in Attachment A.

4. ICNU has a substantial interest in PGE's Application for Deferral of Costs and Benefits Due to Hydro Generation Variance. PGE filed its initial application on December 30, 2004, and amended its application on January 21, 2005. PGE proposes to establish a Hydro Generation Balancing Account for deferral of costs and benefits due to variance in hydro-based energy generation. The deferral mechanism and account proposed in this Docket could directly affect the rates and quality of service that PGE provides to ICNU's members. PGE states that its initial application that the purpose of the deferral is to allow the outcome of Docket No. UE 165, in which PGE proposed Schedule 128, to be made effective January 1, 2005. ICNU already is a party to UE 165.

5. ICNU represents the interests of a number of large electric customers in the State of Oregon. ICNU participated in UM 1071, PGE's previous docket regarding deferral of hydro-variance costs. 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 these proceedings. It is in the public interest to allow ICNU to intervene in this proceeding.

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WHEREFORE, ICNU respectfully requests that the Commission grant its petition to intervene with full party status in this proceeding.

Dated this 4th day of February, 2005.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ S. Bradley Van Cleve

S. Bradley Van Cleve

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 Structural, 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*

* *Denotes PGE Customers*

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing Petition to Intervene of the Industrial Customers of Northwest Utilities upon the service list, shown below, by causing the same to be mailed, postage-prepaid, through the U.S. Mail.

DATED this 4th day of February, 2005

Davison Van Cleve, P.C.

/s/ Ally Smith
Ally L. Smith

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