

Davison Van Cleve PC

Attorneys at Law

TEL (503) 241-7242 • FAX (503) 241-8160 • mail@dvclaw.com
Suite 400
333 S.W. Taylor
Portland, OR 97204

May 27, 2005

Via Electronic and US Mail

Public Utility Commission of Oregon
Attn: Filing Center
550 Capitol St. NE #215
P.O. Box 2148
Salem OR 97308-2148

Re: In the Matter of PACIFIC POWER & LIGHT Application for Power Cost
Adjustment Mechanism
Docket No. UE 173

Dear Filing Center:

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

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

Sincerely,

/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 on behalf of the Industrial Customers of Northwest Utilities upon the parties on the service list, shown below, by causing the same to be mailed, postage-prepaid, through the U.S. Mail.

Dated at Portland, Oregon, this 27th day of May, 2005.

/s/ Christian Griffen
Christian W. Griffen

LOWREY R BROWN CITIZENS' UTILITY BOARD OF OREGON 610 SW BROADWAY, SUITE 308 PORTLAND OR 97205 lowrey@oregoncub.org	DATA REQUEST RESPONSE CENTER PACIFICORP 825 NE MULTNOMAH, SUITE 800 PORTLAND OR 97232 datarequest@pacificorp.com
JASON EISDORFER CITIZENS' UTILITY BOARD OF OREGON 610 SW BROADWAY STE 308 PORTLAND OR 97205 jason@oregoncub.org	MAURY GALBRAITH PUBLIC UTILITY COMMISSION PO BOX 2148 SALEM OR 97308-2148 maury.galbraith@state.or.us
D DOUGLAS LARSON PACIFICORP ONE UTAH CENTER 201 SOUTH MAIN STREET, SUITE 2300 SALT LAKE CITY UT 84111 doug.larson@pacificorp.com	KATHERINE A MCDOWELL STOEL RIVES LLP 900 SW FIFTH AVE STE 1600 PORTLAND OR 97204-1268 kamcdowell@stoel.com

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 173

In the Matter of)	
)	
PACIFICORP)	PETITION TO INTERVENE OF THE
)	INDUSTRIAL CUSTOMERS OF
Application for Approval of Power Cost)	NORTHWEST UTILITIES
Adjustment Mechanism.)	
_____)	

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. In support of this petition, ICNU represents as follows:

1. The business address of ICNU is:

Ken Canon
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 and consultant at the following addresses:

Melinda J. Davison	Randall J. Falkenberg
Irion Sanger	RFI Consulting, Inc.
Davison Van Cleve, P.C.	8351 Roswell Road, PMB 362
333 S.W. Taylor, Suite 400	Atlanta, GA 30350
Portland, OR 97204	E-Mail: consultrfi@aol.com
E-Mail: mail@dvclaw.com	Telephone: (770) 379-0505
Telephone: (503) 241-7242	Facsimile: (770) 671-1046
Facsimile: (503) 241-8160	

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, as shown in Attachment A.

4. ICNU has a substantial interest in PacifiCorp's application for approval of a power cost adjustment mechanism ("PCAM") in this proceeding. The PCAM would allow PacifiCorp to change its rates and to allocate to ratepayers a larger portion of the risk of variations in the Company's net power costs. Any Commission decision regarding the PCAM could have an impact on the rates that PacifiCorp charges to ICNU's members.

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 27th day of May, 2005.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Irion Sanger

Melinda J. Davison

Irion Sanger

Davison Van Cleve, P.C.

333 S.W. Taylor, Suite 400

Portland, Oregon 97204

(503) 241-7242 phone

(503) 241-8160 facsimile

mail@dvclaw.com

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 PacifiCorp customers*