



MEMO

August 23, 2005

TO: Administrative Law Judge Christina M. Smith

FROM: Andrea Fogue, League of Oregon Cities

RE: Motion to Submit Late Filing and Petition to Intervene
in UF 4218 and UM 1206

Enclosed you will find an original and one copy of the League's Petition to Intervene in UF 4218 and UM 1206 and Motion to Submit Late Filing. Please don't hesitate to contact me at (503) 507-8275 if you have questions.

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UF 4218/UM 1206

In the Matter of)	
)	
Portland General Electric Company)	MOTION TO SUBMIT LATE
Application for an Order Authorizing the)	FILING
Issuance of 62,500,000 Shares of New)	
Common Stock)	
)	
and)	
)	
)	
Stephen Forbes Cooper, LLC as Disbursing)	
Agent on behalf of the Reserve for)	
Disputed Claims Application for an Order)	
Allowing the Reserve for Disputed Claims)	
to Acquire the Power to Exercise)	
Substantial Influence over the Affairs and)	
Policies of Portland General Electric)	
Company.)	

The League requests that our Petition to Intervene be granted. Due to an administrative oversight on our part, we did not submit the petition before the deadline. We sincerely regret this oversight and ask you consider our impeccable track record of punctuality when you consider this request.

Representing all 240 incorporated cities in Oregon, 52 of those served directly by Portland General Electric, the League has a significant interest in ensuring that we have the opportunity to participate in this proceeding.

With that said, the League has participated in many proceedings before the Public Utility Commission, the most recent being UM 1121 and has not unreasonably broadened the issues or burdened the record.

The League has been a local government association for over 75 years and has a long history of working with both consumer-owned and investor-owned utilities, the Oregon Public Utility Commission, Bonneville Power Administration, consumer advocates, industry representatives and others to ensure that Oregon communities are provided with reliable, safe, and affordable electric utility service.

Based on the information provided above in accordance with the Commission's rules of procedure, I request to participate in this proceeding as an intervenor. I or the organization that I represent will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding. OAR 860-013-0021.

Petitioner or Petitioner's Representative

Date

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UF 4218/UM 1206

In the Matter of)	
)	
Portland General Electric Company)	PETITION TO INTERVENE
Application for an Order Authorizing the)	
Issuance of 62,500,000 Shares of New)	
Common Stock)	
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and)	
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Stephen Forbes Cooper, LLC as Disbursing)	
Agent on behalf of the Reserve for)	
Disputed Claims Application for an Order)	
Allowing the Reserve for Disputed Claims)	
to Acquire the Power to Exercise)	
Substantial Influence over the Affairs and)	
Policies of Portland General Electric)	
Company.)	

NAME OF PETITIONER: League of Oregon Cities, represented by Andrea J. Fogue
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NAME OF COUNSEL FOR PETITIONER: Christy K. Monson
COUNSEL'S ADDRESS: 1201 Court St. NE, Ste. 200, Salem, Oregon 97301
COUNSEL'S PHONE NUMBER: (503) 588-6550
COUNSEL'S FAX NUMBER: (503) 399-4863
COUNSEL'S E-MAIL ADDRESS: cmonson@orcities.org

IF THE PETITIONER IS AN ORGANIZATION, THE NUMBER OF MEMBERS IN AND THE PURPOSES OF THE ORGANIZATION:

The League of Oregon Cities is a voluntary association of 240 incorporated cities throughout the state. The League was founded in 1925 and provides a wide array of services from training and research to policy setting and legislative advocacy.

NATURE AND EXTENT OF THE PETITIONER'S INTEREST IN THE PROCEEDING:

The League's membership includes all 52 cities served by Portland General Electric (PGE). In addition to protecting the interests of cities as consumers of electricity, approximately \$2 million ratepayers reside in Oregon cities.

THE ISSUES THE PETITIONER INTENDS TO RAISE AT THE PROCEEDING:

The intent of the League is to address issues of importance to cities in Oregon and their residents. In addition to protecting the interests of cities as consumers of electricity and their ratepayers a primary issue for the League is retaining all local taxes and fees and our ability to manage and receive compensation for the use of local rights of way.

These local taxes and fees are essential to the ability of cities to provide services to meet the needs and expectations of Oregon's citizens and businesses.

ANY SPECIAL KNOWLEDGE OR EXPERTISE OF THE PETITIONER THAT WOULD ASSIST THE COMMISSION IN RESOLVING THE ISSUES IN THE PROCEEDING:

The League has been a local government association for over 75 years and has a long history of working with both consumer-owned and investor-owned utilities, the Oregon Public Utility Commission, Bonneville Power Administration, consumer advocates, industry representatives and others to ensure that Oregon communities are provided with reliable, safe, and affordable electric utility service.

In addition, the League has participated in many proceedings before the Public Utility Commission, some of the most recent being AR 394, AR 421, UE 115, UE 116, UE 118, UE 119 and UM 1121

Based on the information provided above in accordance with the Commission's rules of procedure, I request to participate in this proceeding as an intervenor. I or the organization that I represent will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding. OAR 860-013-0021.

Petitioner or Petitioner's Representative

Date

CERTIFICATE OF SERVICE

I hereby certify that on August 23, 2005, I mailed an original and one copy of the foregoing PETITION TO INTERVENE ON BEHALF OF THE LEAGUE OF OREGON CITIES to:

PUC ADMINISTRATIVE HEARINGS DIVISION
ATTN: FILING CENTER
PO BOX 2148
SALEM, OR 97308-2148

and on August 23, 2005, I hereby certify that the foregoing document was electronically mailed to all Persons on the Service List maintained by the Public Utility Commission for the UF 4218/UM 1206 proceeding who had an e-mail address posted. I further certify that for those persons on the Service List who were not identified as having an e-mail address, a copy was sent by mail, contained in a sealed envelope, with postage paid, and deposited in the post office at Salem, Oregon on said day.

Andrea J. Fogue, League of Oregon Cities

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