

# RAMIS CREW CORRIGAN LLP

ATTORNEYS AT LAW

1727 NW HOYT STREET  
PORTLAND, OREGON 97209  
TELEPHONE (503) 222-4402  
FAX (503) 243-2944  
WWW.RCCLAWYERS.COM

Timothy V. Ramis  
[sharong@rcclawyers.com](mailto:sharong@rcclawyers.com)

July 28, 2005

Honorable Christina Smith  
Administrative Law Judge  
Oregon Public Utility Commission  
550 Capitol Street NE  
Salem, OR 97301

**Re: UF 4218/UM 1206 - In the Matter of Portland General Electric Company  
Application for an Order Authorizing the Issuance of 62,500,000 Shares of New  
Common Stock Pursuant to ORS 757.410 *et seq.* and In the Matter of Stephen  
Forbes Cooper, LLC Pursuant to ORS 757.511**

Dear Judge Smith:

Enclosed for filing, please find an original and five copies of the City of West Linn's petition to intervene in the above mentioned matter. Copies of this petition have been submitted electronically and mailed, postage paid, to the UF 4218/UM 1206 service list.

If you have any questions, please do not hesitate to call.

Very truly yours,

  
Timothy V. Ramis

TVR/lrs  
Enclosures  
cc: Service List

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

UF 4218/UM 1206

In the Matter of	)	
PORTLAND GENERAL ELECTRIC	)	
COMPANY Application for an Order	)	
Authorizing the Issuance of 62,500,000	)	PETITION OF
Shares of New Common Stock	)	CITY OF WEST LINN
Pursuant to ORS 757.410 et seq. (UF 4218)	)	TO INTERVENE AND
	)	PARTICIPATE AS A PARTY
and	)	
	)	
	)	
In the Matter of	)	
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 Pursuant to	)	
ORS 757.511 (UM 1206)	)	

Pursuant to ORS 756.525 and OAR 860-12-0001 the City of West Linn, Oregon, petitions to intervene and appear as a party in this proceeding. In support of its petition, the City of West Linn states:

1. The City of West Linn, Oregon (West Linn) is a municipal corporation duly authorized and existing under the laws of the State of Oregon.

2. The business address for West Linn is:

Ron Garzini  
Interim City Manager  
City of West Linn  
22500 Salamo Road  
West Linn, OR 97068  
503-657-0331  
e-mail: [rgarzini@ci.west-linn.or.us](mailto:rgarzini@ci.west-linn.or.us)

3. West Linn will be represented in this proceeding by City Attorney Timothy V. Ramis. All documents relating to the proceeding should be served on West Linn through Mr. Ramis at the following address:

Timothy V. Ramis  
Ramis Crew Corrigan LLP  
1727 NW Hoyt Street  
Portland, OR 97239  
e-mail: [timr@rcclawyers.com](mailto:timr@rcclawyers.com)

4. PGE provides electric utility service within the West Linn and owns power production and distribution facilities within the city limits of West Linn. PGE provides retail service and uses West Linn rights-of-way pursuant to a franchise granted by West Linn. West Linn receives electric service from PGE.

5. West Linn has responsibility for proper administration of utility franchises within the City and responsibility for proper administration of rights-of-way within the City. The City regulates rights-of-way by franchise and right-of-way permits.

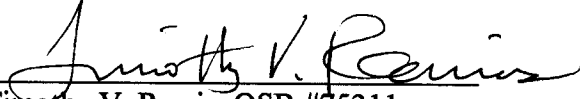
6. West Linn has a substantial interest in this matter and could be affected by the outcome of this proceeding. The status of the West Linn's electric utility franchisee will be affected by the outcome of this proceeding. West Linn's experience in administering electric utility franchises could assist the Commission in this proceeding.

7. West Linn's appearance and participation will not unreasonably broaden the issues, burden the record, or otherwise delay this proceeding. West Linn will address issues relevant to its interests.

THEREFORE, the City of West Linn respectfully requests that it be allowed to intervene and participate as a party.

Dated this 28<sup>th</sup> day of July, 2005

RAMIS CREW CORRIGAN LLP

  
\_\_\_\_\_  
Timothy V. Ramis, OSB #75311  
City Attorney for City of West Linn

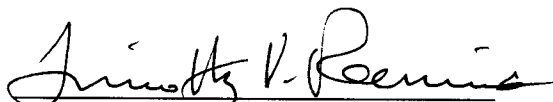
## CERTIFICATE OF FILING AND SERVICE

I hereby certify that on July 28, 2005 I filed the foregoing petition by electronic copy to Case Manager Bryan Conway, e-mail address: [bryan.conway@state.or.us](mailto:bryan.conway@state.or.us) and by mailing the original and five copies of the petition by first class mail to

PUC Administrative Hearings Division  
550 Capitol Street NE, Suite 215  
Salem, OR 97310-2551.

I further certify that I served a copy of the foregoing Petition to Intervene electronically on all parties and by U.S. Mail, postage-prepaid, to those parties listed on the UF 4218/UM 1206 service list, a copy of which is attached.

DATED this 28<sup>th</sup> day of July, 2005.

A handwritten signature in black ink, appearing to read "Timothy V. Ramis". The signature is written in a cursive style with a horizontal line underneath it.

Timothy V. Ramis, OSB #75311  
Attorney for City of West Linn

## **SERVICE LIST**

Jim Abrahamson  
Community Action Directors of Oregon  
4035 12<sup>th</sup> Street Cutoff SE, Ste 110  
Salem, OR 97302  
[jim@cado-oregon.org](mailto:jim@cado-oregon.org)

Susan Anderson  
City of Portland Office of Sustainable Dev  
721 NW 9<sup>th</sup> Ave, Suite 350  
Portland, OR 97209-3447  
[susananderson@ci.portland.or.us](mailto:susananderson@ci.portland.or.us)

Julie Bates  
Bonneville Power Administration  
905 NE 11<sup>th</sup> Ave  
Portland, OR 97208  
[jabates@bpa.gov](mailto:jabates@bpa.gov)

Lowrey R. Brown  
Citizens' Utility Board of Oregon  
610 SW Broadway, Suite 308  
Portland, OR 97205  
[lowrey@oregoncub.org](mailto:lowrey@oregoncub.org)

Joan Cote  
Oregon Emergency Coordinators Assoc.  
Salem, OR 97301  
[cotej@mwwcaa.org](mailto:cotej@mwwcaa.org)

J Jeffrey Dudley  
Portland General Electric  
121 SW Salmon Street 1WTC1300  
Portland, OR 97204  
[jay.dudley@pgn.com](mailto:jay.dudley@pgn.com)

James F. Fell  
Stoel Rives LLP  
900 SW 5<sup>th</sup> Ave, Ste 2600  
Portland, OR 97204-1268  
[jffell@stoel.com](mailto:jffell@stoel.com)

PGE Mutual Utility, Inc.  
5 Centerpointe Drive, Ste 400  
Lake Oswego, OR 97035

Stephanie S. Andrus  
Department of Justice  
Regulated Utility & Business Section  
1162 Court St. NE  
Salem, OR 97301-4096  
[stephanie.andrus@state.or.us](mailto:stephanie.andrus@state.or.us)

Ken Beeson  
Eugene Water & Electric Board  
500 East Fourth Avenue  
Eugene, OR 97440-2148  
[ken.beeson@eweb.eugene.or.us](mailto:ken.beeson@eweb.eugene.or.us)

J Laurence Cable  
Cable Huston Benedict ET AL  
1001 SW 5<sup>th</sup> Ave Ste 2000  
Portland, OR 97201-1136  
[lcable@chbh.com](mailto:lcable@chbh.com)

Melinda J. Davison  
Davison Van Cleve PC  
333 SW Taylor, Ste 400  
Portland, OR 97204  
[mail@dvclaw.com](mailto:mail@dvclaw.com)

Jason Eisdorfer  
Citizens' Utility Board of Oregon  
610 SW Broadway Ste 308  
Portland, OR 97205  
[jason@oregoncub.org](mailto:jason@oregoncub.org)

David Koogler  
Enron Corporation  
PO Box 1188  
Houston, TX 77251-1188  
[david.koogler@enron.com](mailto:david.koogler@enron.com)

Geoffrey M. Kronick LC7  
Bonneville Power Administration  
PO Box 3621  
Portland, OR 97208-3621  
[gmdronick@bpa.gov](mailto:gmdronick@bpa.gov)

Daniel W. Meek  
Attorney at Law  
10949 SW 4<sup>th</sup> Ave  
Portland, OR 97219  
[dan@meek.net](mailto:dan@meek.net)

PGE-OPUC Filings  
Rates & Regulatory Affairs  
Portland General Electric Company  
121 SW Salmon Street, 1WTC0702  
Portland, OR 97204  
[pge.opuc.filings@pgn.com](mailto:pge.opuc.filings@pgn.com)

Craig Smith  
Bonneville Power Administration  
PO Box 3621-L7  
Portland, OR 97208-3621  
[cmsmith@bpa.gov](mailto:cmsmith@bpa.gov)

Gordon McDonald  
Pacific Power & Light  
825 NE Multnomah Ste 800  
Portland, OR 97232  
[gordon.mcdonald@pacificcorp.com](mailto:gordon.mcdonald@pacificcorp.com)

Michael M. Morgan  
Tonkon Torp LLP  
888 SW 5<sup>th</sup> Ave, Ste 1600  
Portland, OR 97204-2099  
[mike@tonkon.com](mailto:mike@tonkon.com)

Lawrence Reichman  
Perkins Coie LLP  
1120 SW Couch St - 10 FL  
Portland, OR 97209-4128  
[lreichman@perkinscoie.com](mailto:lreichman@perkinscoie.com)

Benjamin Walters  
City of Portland - Office of City Attorney  
1221 SW 4<sup>th</sup> Ave - Rm 430  
Portland, OR 97204  
[bwalters@ci.portland.or.us](mailto:bwalters@ci.portland.or.us)