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BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

UF 4218/UM 1206

In the Matter of the Application of
PORTLAND GENERAL ELECTRIC
COMPANY 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 the Application of
STEPHEN FORBES COOPER, LLC, as
Disbursing Agent, on behalf of the
RESERVE FOR DISPUTED CLAIMS, 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.

PETITION TO INTERVENE BY PGE
MUTUAL UTILITY, INC.

Pursuant to *OAR* 860-013-0021, petitioner PGE Mutual Utility, Inc. respectfully submits
this petition to intervene in the above-referenced dockets.

I. Name and Address of Petitioner

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

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1 **11. Name and Address of Petitioner's Attorneys**

2 Petitioner will be represented in these proceedings by the following attorneys:

3 Lawrence Reichman, OSB No. 86083
4 Ivan Gold, OSB No. 72102
5 PERKINS COIE LLP
6 1120NW Couch St., 10th Floor
7 Portland, Oregon 97209
(503)727-2019, LReichman@perkinscoie.com
(503)727-2124, IGold@perkinscoie.com
(503)727-2222 (facsimile)

8 **111. Nature and Extent of Petitioner's Interest in This Proceeding**

9 Petitioner is organized as an Oregon nonprofit mutual benefit corporation under ORS
10 Chapter 65. Petitioner is interested in purchasing all of the current outstanding stock of PGE and
11 operating PGE as a mutual benefit corporation for the benefit of its customers. The management
12 team of petitioner has been pursuing legislation in the 2005 Oregon legislative session that would
13 authorize a funding mechanism to permit such an acquisition. Petitioner is interested in this
14 proceeding because its ability to purchase PGE will be affected by the outcome of this
15 proceeding. Accordingly, petitioner has a sufficient interest in this proceeding.
16

17 **IV. The Issues the Petitioner Intends to Raise in the Proceeding**

18 Petitioner intends to raises issues with respect to whether the issuance of securities by
19 PGE and the acquisition of the power to exercise substantial influence over PGE, as proposed in
20 the pending Application, satisfy the applicable statutory standards and criteria.

21 **V. Any Special Knowledge or Expertise of the Petitioner Which Would Assist
22 the Commission in Resolving the Issues in the Proceeding**

23 The members of the management team of petitioner collectively have over 200 years
24 experience in the management of electric utilities in Oregon. In addition, they recently have
25 focused considerable attention in connection with their legislative efforts on the potential
26

1 acquisition of PGE. For these reasons, petitioner can bring considerable relevant knowledge and
2 expertise to bear upon the issues that will be presented to the Commission for decision.

3 The Application was filed on or about June 17,2005. The Commission has not yet
4 established a procedural schedule in this docket. Accordingly, petitioner's appearance and
5 participation will not unreasonably delay the proceeding. Petitioner's intervention will not
6 burden the record or unreasonably broaden the issues.

7 For the foregoing reasons, petitioner PGE Mutual Utility, Inc. respectfully requests that
8 the Commission grant its petition to intervene in these combined dockets.

9 DATED: July 13,2005.

10 Respectfully submitted,

11 **PERKINS COIE, LLP**

12 

13

Lawrence H. Reichman, OSB No. 86083

Ivan Gold, OSB No. 72102

14 Attorneys for Petitioner PGE Mutual Utility, Inc.

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I served the foregoing **PETITION TO INTERVENE BY PGE**
3 **MUTUAL UTILITY, INC.** in Dockets UF 42 18/UM 1206 on the following named person(s) on
4 the date indicated below by

5 mailing with postage prepaid

6 electronic mail (email)

7
8 to said person(s) a true copy thereof, contained in a sealed envelope, addressed to said person(s)
9 at his or her last-known address(es) indicated below:

10 SEE ATTACHED SERVICE LIST

11
12
13 DATED: July 13, 2005

14 

15 _____
16 Lawrence H. Reichman, OSB 86083

17 Counsel for Petitioner PGE Mutual Utility, Inc.
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**SERVICE LIST
UF 4218/UM 1206**

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