

# Davison Van Cleve PC

Attorneys at Law

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

March 16, 2010

*Via Electronic and U.S. Mail*

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

Re: In the Matter of PORTLAND GENERAL ELECTRIC COMPANY  
Application for Deferred Accounting of Savings associated with the 2005 Oregon  
Corporate Tax Kicker  
**Docket No. UM 1252**

Dear Filing Center:

Enclosed please find an original and one courtesy copy of the Petition to Intervene on behalf of the Industrial Customers of Northwest Utilities in the above-referenced docket. Thank you for your attention to this matter.

Sincerely yours,

/s/ Brendan E. Levenick  
Brendan E. Levenick

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, by causing the same to be deposited in the U.S. Mail, postage-prepaid, and via electronic mail where paper service has been waived.

Dated at Portland, Oregon, this 16th day of March, 2010.

/s/ Brendan E. Levenick

Brendan E. Levenick

**DEPARTMENT OF JUSTICE**

JASON W JONES  
1162 COURT ST NE  
SALEM OR 97301-4096  
jason.w.jones@state.or.us

**(W) CITIZENS' UTILITY BOARD OF OREGON**

GORDON FEIGHNER (C)  
ROBERT JENKS (C)  
G. CATRIONA MCCRACKEN (C)  
RAYMOND MYERS (C)  
610 SW BROADWAY, SUITE 308  
PORTLAND OR 97205  
gordon@oregoncub.org  
bob@oregoncub.org  
catriona@oregoncub.org  
ray@oregoncub.org

**PUBLIC UTILITY COMMISSION**

CARLA OWINGS  
REVENUE REQUIREMENTS ANALYST  
PO BOX 2148  
SALEM OR 97308-2148  
carla.m.owings@state.or.us

**PORTLAND GENERAL ELECTRIC**

RATES AND REGULATORY AFFAIRS  
DOUGLAS C TINGEY  
121 SW SALMON ST - 1WTC0702  
PORTLAND OR 97204  
pge.opuc.filings@pgn.com  
doug.tingey@pgn.com

**BEFORE THE PUBLIC UTILITY COMMISSION**

**OF OREGON**

**UM 1252**

In the Matter of )  
 )  
PORTLAND GENERAL ELECTRIC ) PETITION TO INTERVENE OF THE  
COMPANY ) INDUSTRIAL CUSTOMERS OF  
 ) NORTHWEST UTILITIES  
 )  
Application for Deferred Accounting of )  
Savings associated with the 2005 Oregon )  
Corporate Tax Kicker )

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Pursuant to ORS § 756.525 and OAR § 860-012-0001, the Industrial Customers of Northwest Utilities (“ICNU”) hereby petitions the Oregon Public Utility Commission (“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:  
  
Michael Early  
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 attorney and consultant at the following addresses:

S. Bradley Van Cleve  
Davison Van Cleve, P.C.  
333 S.W. Taylor, Ste. 400  
Portland, OR 97204  
E-Mail: mail@dvclaw.com  
Telephone: (503) 241-7242

Ellen Blumenthal  
GDS Associates, Inc.  
13517 Queen Johanna Court  
Corpus Christi, TX 78418  
(361) 949-1578  
ellen.blumenthal@gdsassociates.com

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 members of ICNU are customers of Portland General Electric Company (“PGE”), as indicated on Attachment A.

4. ICNU has a substantial interest in the impacts of PGE’s Application for Deferred Accounting of Savings associated with the 2005 Oregon Corporate Tax Kicker. The proposed Application may substantially and directly affect those of ICNU’s members who purchase power from PGE. ICNU requests leave to intervene in this Docket to represent its members who are affected by the proposed Application.

5. ICNU represents the interests of many of PGE’s largest customers. ICNU was a party in PGE’s most recent general rate case, Docket No. UE 197, and is a party to PGE’s current rate case, UE 215. ICNU has also been an active participant in proceedings affecting PGE’s rates for the last ten years. ICNU’s intervention in this proceeding will assist the Commission in resolving the issues in this proceeding and will not unreasonably broaden the issues, burden the record, or unreasonably 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.

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

Dated this 16th day of March, 2010.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ S. Bradley Van Cleve

S. Bradley Van Cleve

333 S.W. Taylor, Suite 400

Portland, Oregon 97204

(503) 241-7242 phone

(503) 241-8160 facsimile

mail@dvclaw.com

Of Attorneys for the Industrial Customers of  
Northwest Utilities

**ATTACHMENT A**  
**INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES**

Air Liquide  
Air Products  
Amcor PET Packaging USA, Inc. (CNC Containers Northwest)  
Certain Teed Gypsum & Ceiling Manufacturing, Inc. (BPB)  
\*Blue Heron Paper Company  
\*Boeing  
Boise Cascade LLC  
\*Boise Paper  
ConAgra Foods  
Dyno Nobel, Inc.  
Eka Chemicals, Inc.  
Emerald Performance Materials, LLC  
Equa-Chlor, LLC  
Evanite Fiber  
\*Evraz Oregon Steel Mills  
Freres Lumber Company  
Georgia-Pacific  
Grays Harbor Paper, L.P.  
Hewlett-Packard  
Inland Empire Paper Co.  
\*Intel  
International Paper  
\*J.R. Simplot  
Kimberly-Clark Corporation  
\*Linde, Inc.  
Longview Fibre  
Microsoft Corporation  
\*Norpac Foods  
\*PCC Structurals, Inc.  
Ponderay Newsprint  
REC Solar Grade Silicon LLC  
Shell Oil Products US  
Simpson Paper & Timber  
\*SP Newsprint  
Tesoro Refining and Marketing Co.  
Wah Chang  
\*West Linn Paper Company  
Weyerhaeuser

*\*Denotes PGE Customers*