

# Davison Van Cleve PC

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April 5, 2006

*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 PACIFICORP, dba PACIFIC POWER & LIGHT COMPANY  
Application for Deferred Accounting Order Regarding Grid West Loan Costs  
**Docket No. UM 1257**

Dear Filing Center:

Enclosed please find the original and two copies of the Petition to Intervene on behalf of the Industrial Customers of Northwest Utilities ("ICNU") in the above-referenced docket.

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

Sincerely,

/s/ Anna E. Studenny  
Anna E. Studenny

Enclosures

cc: Service List

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have this day served the foregoing Petition to Intervene of the Industrial Customers of Northwest Utilities upon the parties, on the service list, by causing the same to be deposited via Electronic Mail and in the U.S. Mail, postage-prepaid.

Dated at Portland, Oregon, this 5th day of April, 2006.

/s/ Anna E. Studenny  
Anna E. Studenny

**CITIZENS' UTILITY BOARD OF OREGON**  
JASON EISDORFER  
610 SW BROADWAY - STE 308  
PORTLAND OR 97205  
jason@oregoncub.org

**PACIFICORP**  
LAURA BEANE  
MANAGER, REGULATION  
825 MULTNOMAH STE 800  
PORTLAND OR 97232-2153  
laura.beane@pacificorp.com

**STOEL RIVES LLP**  
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**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1257**

In the Matter of	)	
	)	
PACIFICORP, dba PACIFIC POWER & LIGHT COMPANY	)	PETITION TO INTERVENE OF THE INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES
	)	
Application for Deferred Accounting Order Regarding Grid West Loan Costs.	)	
_____	)	

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(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 attorneys and consultant at the following address:

Melinda J. Davison  
Irion Sanger  
Davison Van Cleve, P.C.  
333 S.W. Taylor, Suite 400  
Portland, OR 97204  
E-Mail: mail@dvclaw.com  
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Lincoln Wolverton  
East Fork Economics  
35011 North Fork Road  
PO Box 620  
La Center, WA 98629  
E-Mail: lwolv@tds.net  
Telephone: 360-263-3675  
Facsimile: 360-263-3675

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 Deferred Accounting Order Regarding Grid West Loan Costs ("Application"), which was filed on March 23, 2006. PacifiCorp proposes to defer the costs associated with its loan to Grid West. PacifiCorp proposes to address the amortizations of these costs in its current rate case, Docket No. UE 179. The deferral account proposed in this Docket directly affects the rates that PacifiCorp provides to ICNU's members. ICNU strongly opposes PacifiCorp's Application and will file comments on PacifiCorp's request by April 25, 2006.

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 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 5th day of April, 2006.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Melinda J. Davison

Melinda J. Davison

Irion Sanger

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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  
SP Newsprint Co.  
Tesoro Refining and Marketing Co.  
\*Wah Chang  
West Linn Paper Company  
\*Weyerhaeuser

\*Denotes PacifiCorp Customers