

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1262

In the matter of the Complaint of)	
)	
CITY OF PORTLAND)	PETITION TO INTERVENE OF THE
)	INDUSTRIAL CUSTOMERS OF
Against PORTLAND GENERAL)	NORTHWEST UTILITIES
ELECTRIC, an Oregon Corporation,)	
Pursuant to ORS 756.500.)	
_____)	

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 addresses:

Melinda J. Davison	James T. Selecky
Matthew Perkins	Brubaker & Associates
Davison Van Cleve, P.C.	1215 Fern Ridge Pkwy
333 S.W. Taylor, Suite 400	Suite 208
Portland, OR 97204	St. Louis, MO 63141
E-Mail: mail@dvclaw.com	Email: jtselecky@consultbai.com
Telephone: 503-241-7242	Telephone: (314) 275-7007
Facsimile: 503-241-8160	Facsimile: (314) 275-7036

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 Portland General Electric Company ("PGE"), as shown in Attachment A.

4. ICNU has a substantial interest in the City of Portland's Complaint against PGE, which was filed on May 3, 2006. The City of Portland alleges that PGE and Enron were not unitary under Oregon law and should not have filed consolidated income tax statements, and that PGE's cash payments for taxes to Enron were lacking the required tax allocation agreement approved by the Securities and Exchange Commission and the OPUC. The resolution of the Complaint in this docket could have a direct and substantial impact on the rates that PGE provides to ICNU's members.

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 23rd day of May, 2006.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Matthew Perkins

Melinda J. Davison

Matthew Perkins

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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 PGE Customers*

Davison Van Cleve PC

Attorneys at Law

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May 23, 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 CITY OF PORTLAND v. PORTLAND GENERAL ELECTRIC
Docket No. UM 1262

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 in the above-referenced matter.

Please return one file-stamped copy in the postage-prepaid 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 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.

Dated at Portland, Oregon, this 23rd day of May, 2006.

/s/ Anna E. Studenny
Anna E. Studenny

**PORTLAND CITY OF - OFFICE OF CITY
ATTORNEY**
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