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July 28, 2006

Via Electronic Mail 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 PUBLIC UTILITY COMMISSION OF OREGON Staff
Investigation into Harbinger's Ownership of more than Five Percent of
PGE's Common Stock
Docket No. UM 1268

Dear Filing Center:

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

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

Sincerely,

/s/ Christian Griffen
Christian W. Griffen

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 official service list for UM 1268, shown below, via U.S. Mail and electronic mail.

Dated at Portland, Oregon, this 28th day of July, 2006.

/s/ Christian Griffen
Christian W. Griffen

CITIZENS' UTILITY BOARD OF OREGON OPUC DOCKETS 610 SW BROADWAY STE 308 PORTLAND OR 97205 dockets@oregoncub.org	DEPARTMENT OF JUSTICE PAUL GRAHAM REGULATED UTILITY & BUSINESS SECTION 1162 COURT ST NE SALEM OR 97301-4096 paul.graham@state.or.us
PERKINS COIE LLP LAWRENCE REICHMAN 1120 NW COUCH ST - 10 FL PORTLAND OR 97209-4128 lreichman@perkinscoie.com	

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1268

In the Matter of)	
)	
PUBLIC UTILITY COMMISSION OF OREGON)	PETITION TO INTERVENE OF THE INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES
)	
Staff Investigation into Harbinger's Ownership of more than Five Percent of PGE's Common Stock.)	

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 at the following address:

Melinda J. Davison
Matthew W. Perkins
Davison Van Cleve, P.C.
333 S.W. Taylor, Suite 400
Portland, OR 97204
E-Mail: mail@dvclaw.com
Telephone: 503-241-7242
Facsimile: 503-241-8160

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 Staff's investigation into Harbinger's ownership of more than five percent of PGE's common stock. Harbinger filed an application for a declaratory ruling that Harbinger is not required to file an application for authorization under ORS § 757.511 with respect to its ownership of PGE common stock, which was docketed as DR 37. The Commission denied the application and required Harbinger to file an application pursuant to ORS § 757.511. On June 30, 2006, Harbinger filed a request for a hearing to determine whether it would still be required to file the application.

5. ICNU participated in UM 1206 and is a signatory to the stipulation on which PGE's stock distribution is based. ICNU's members have a direct interest in assuring that any entity owning over 5% of PGE's common stock follows the statutes that govern such ownership. In Oregon, the acquisition of a substantial part of a public utility such as PGE must "serve the public utility's customers in the public interest." ORS § 757.511(3). An application pursuant to ORS § 757.511(1) is a necessary step in protecting customers and ensuring that the acquisition is in the public interest. Harbinger should not be allowed to circumvent fundamental customer protections mandated by the Legislature. Any entity with substantial influence over PGE could have a direct impact on the service and rates that PGE provides to its customers, including ICNU's members. 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. ICNU represents the interests of a number of large electric customers of PGE. 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 28th day of July, 2006.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Melinda J. Davison

Melinda J. Davison

Matthew W. Perkins

Davison Van Cleve, P.C.

333 S.W. Taylor, Suite 400

Portland, Oregon 97204

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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*