



**Portland General Electric Company**  
Legal Department  
121 SW Salmon Street • Portland, Oregon 97204  
(503) 464-7671 • Facsimile (503) 464-2200

**Richard George**  
Assistant General Counsel

*Fax*  
**RECEIVED**

**OCT 10 2006**

October 10, 2006

Public Utility Commission of Oregon  
Administrative Hearing Division

*Via Electronic Filing and U.S. Mail*

Oregon Public Utility Commission  
Attention: Filing Center  
PO Box 2148  
Salem OR 97308-2148

Re: UM 1276

Attention Filing Center:

Enclosed for filing in the captioned dockets are an original and two copies of:

- **MOTION TO INTERVENE OF PORTLAND GENERAL ELECTRIC COMPANY**

This document is being filed by electronic mail with the Filing Center.

An extra copy of this cover letter is enclosed. Please date stamp the extra copy and return it to me in the envelope provided.

Thank you in advance for your assistance.

Sincerely,

**J. RICHARD GEORGE**

JRG:jbf  
Enclosure

cc: Service List – UM 1276



**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**RECEIVED**

OCT 10 2006

UM 1276

<p>In the Matter of Public Utility Commission of Oregon's Staff's Request to open an investigation regarding performance based ratemaking mechanisms to address potential "build-vs. buy" bias.</p>	<p><b>MOTION TO INTERVENE OF PORTLAND GENERAL ELECTRIC COMPANY</b></p>	<p>Public Utility Commission of Oregon Administrative Hearing Division</p>
---	--	--

Pursuant to ORS § 756.525 and OAR § 860-0012-0001, Portland General Electric Company ("PGE") petitions the Public Utility Commission of Oregon ("Commission") to intervene in this proceeding with full party status as described in OAR § 860-011-0035. In support of this petition, PGE represents as follows:

- a) The name and address of the Company is:

**Portland General Electric Company  
121 SW Salmon Street  
Portland, Oregon 97204**

- b) The names and addresses of the persons to be included on the official service list in this proceeding are:

**J. Richard George  
Assistant General Counsel  
Portland General Electric Company  
121 SW Salmon Street, 1WTC1301  
Portland, OR 97204  
(503) 464- 7611 (telephone)  
(503) 464-2200 (fax)  
richard.george@pgn.com**

**Rates & Regulatory Affairs  
Portland General Electric Company  
121 SW Salmon Street, 1WTC0702  
Portland, OR 97204  
(503) 464-7857 (telephone)  
(503) 464-7651 (fax)  
pge.opuc.filings@pgn.com**

c) PGE is a public utility subject to the jurisdiction of the Commission.

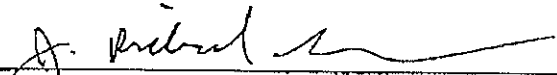
Decisions made and precedent established in this proceeding may directly affect PGE.

d) PGE intends to monitor the proceeding and, if necessary, raise issues that are appropriate to the proceeding. No other party could adequately represent the interests of PGE.

e) PGE's participation in this docket will not unreasonably broaden the issues, burden the record, or unreasonably delay this proceeding.

Accordingly, PGE's petition to intervene should be granted.

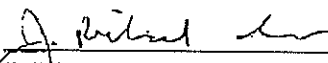
DATED this 10th day of October 2006.

  
\_\_\_\_\_  
J. Richard George  
Assistant General Counsel  
Portland General Electric Company  
121 SW Salmon Street, 1WTC1301  
Portland, OR 97204  
(503) 464-7611 (telephone)  
(503) 464-2200 (telecopier)  
richard.george@pgn.com

### CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the foregoing **MOTION TO INTERVENE OF PORTLAND GENERAL ELECTRIC COMPANY** to be served by First Class US Mail to all parties who have not waived paper service, postage prepaid and properly addressed, and by electronic mail, upon each party on the attached service list.

Dated at Portland, Oregon, this 10th day of October 2006.

  
\_\_\_\_\_  
J. Richard George

## UM 1276 SERVICE LIST

Wendy L. Martin ATER WYNNE <a href="mailto:wlm@aterwynne.com">wlm@aterwynne.com</a>	Lisa F. Rackner ATER WYNNE <a href="mailto:lfr@aterwynne.com">lfr@aterwynne.com</a>
Lowrey R. Brown Utility Analyst CITIZEN'S UTILITY BOARD OF OREGON <a href="mailto:lowrey@oregoncub.com">lowrey@oregoncub.com</a>	Jason Eisdorfer Energy Program Director CITIZEN'S UTILITY BOARD OF OREGON <a href="mailto:Jason@oregoncub.com">Jason@oregoncub.com</a>
Robert Jenks CITIZEN'S UTILITY BOARD OF OREGON <a href="mailto:bob@oregoncub.com">bob@oregoncub.com</a>	Irion A. Sanger Associate Attorney Davison Van Cleve 333 SW Taylor, Suite 400 Portland, Oregon 97204 <a href="mailto:las@dvclaw.com">las@dvclaw.com</a>
Karl Bokenkamp General Manager - Power Supply Planning IDAHO POWER COMPANY <a href="mailto:kbokenkamp@idahopower.com">kbokenkamp@idahopower.com</a>	Ric Gale VP- Regulatory Affairs IDAHO POWER COMPANY <a href="mailto:rgale@idahopower.com">rgale@idahopower.com</a>
Sandra Holms Legal Administrative Assistant IDAHO POWER COMPANY <a href="mailto:jbutler@idahopower.com">jbutler@idahopower.com</a>	Barton L. Kline Senior Attorney IDAHO POWER COMPANY <a href="mailto:bkline@idahopower.com">bkline@idahopower.com</a>
Lisa Nordstrom Attorney IDAHO POWER COMPANY <a href="mailto:lnordstrom@idahopower.com">lnordstrom@idahopower.com</a>	Gregory W. Said Director - Revenue Requirement IDAHO POWER COMPANY <a href="mailto:gsaid@idahopower.com">gsaid@idahopower.com</a>
Steven Weiss Senior Policy Associate NW ENERGY COALITION <a href="mailto:steve@nwenergy.org">steve@nwenergy.org</a>	Randall J. Falkenberg RFI Consulting PMB 362 8343 Roswell Road Sandy Springs, GA 30350 <a href="mailto:consultrfi@aol.com">consultrfi@aol.com</a>