

Attorneys at Law

TEL (503) 241-7242 • FAX (503) 241-8160 • mail@dvclaw.com

Suite 400 333 S.W. Taylor Portland, OR 97204

July 6, 2005

Via Electronic and US 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 STEPHEN FORBES COOPER, LLC, as Disbursing Agent, on behalf of the RESERVE FOR DISPUTED CLAIMS Docket No. UF 4218

In the Matter of Application for an Order Allowing the Reserve for Disputed Claims to Acquire the Power to Exercise Substantial Influence over the Affairs and Policies of Portland, General Electric Company Pursuant to ORS 757.511 Docket No. UM 1206

Dear Filing Center:

Enclosed please find original and two copies of the Notice of Intent to Request an Issue Fund Grant of the Industrial Customers of Northwest Utilities in the above-referenced docket.

Sincerely,

/s/ Sheila R. Ho Sheila R. Ho

Enclosures Service List cc:

#### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing Notice of Intent to

Request an Issue Fund Grant of the Industrial Customers of Northwest Utilities upon the parties,

on the service list shown below, by causing the same to be mailed, postage-prepaid, through the

U.S. Mail, as well as via electronic mail. In addition, pre-certified organizations were served by

the same methods as the service list.

Dated at Portland, Oregon, this 6th day of July, 2005.

<u>/s/ Sheila R. Ho</u> Sheila R. Ho

STEPHANIE S ANDRUS DEPARTMENT OF JUSTICE **REGULATED UTILITY & BUSINESS SECTION** 1162 COURT ST NE SALEM OR 97301-4096 stephanie.andrus@state.or.us

MICHAEL M MORGAN TONKON TORP LLP 888 SW 5TH AVE STE 1600 PORTLAND OR 97204-2099 mike@tonkon.com

MITCHELL TAYLOR ENRON CORPORATION 1221 LAMAR - STE 1600 HOUSTON TX 77251 mitchell.taylor@enron.com

J JEFFREY DUDLEY PORTLAND GENERAL ELECTRIC 121 SW SALMON ST 1WTC1300 PORTLAND OR 97204 jay.dudley@pgn.com

PGE- OPUC FILINGS **RATES & REGULATORY AFFAIRS** PORTLAND GENERAL ELECTRIC COMPANY 121 SW SALMON STREET, 1WTC0702 PORTLAND OR 97204 pge.opuc.filings@pgn.com

JASON EISDORFER CITIZENS' UTILITY BOARD OF OREGON \* 610 SW BROADWAY, SUITE 308 PORTLAND, OR 97205 Jason@oegoncub.org

PAULA PYRON NORTHWEST INDUSTRIAL GAS USERS \* 4113 WOLF BERRY COURT LAKE OSWEGO, OR 97035-1827 ppyron@nwigu.org

\* Denotes pre-certified organizations

## **BEFORE THE PUBLIC UTILITY COMMISSION**

## **OF OREGON**

## UF 4218/UM 1206

In the Matter of	)
PORTLAND GENERAL ELECTRIC COMPANY, Application for an Order Authorizing the Issuance of 62,500,000 Shares of New Common Stock Pursuant to ORS 757.410 et seq. (UF 4218).	) NOTICE OF INTENT TO REQUEST AN ISSUE FUND GRANT OF THE INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES
In the Matter of	) ) )
STEPHEN FORBES COOPER, LLC, as Disbursing Agent, on behalf of the RESERVE FOR DISPUTED CLAIMS,	
Application for an Order Allowing the Reserve for Disputed Claims to Acquire the Power to Exercise Substantial Influence over the Affairs and Policies of Portland General Electric Company Pursuant to ORS 757.511 (UM 1206).	, ) ) ) )

Pursuant to OAR § 860-012-0100 and the Intervenor Funding Agreement ("IFA")

approved by the Public Utility Commission of Oregon ("OPUC" or the "Commission") in Order

No. 03-388 (July 2, 2003), the Industrial Customers of Northwest Utilities ("ICNU") files this

Notice of Intent to Request an Issue Fund Grant in Docket Nos. UF 4218 and UM 1206.

1. Portland General Electric Company ("PGE" or the "Company") and

Stephen Forbes Cooper, LLC ("SFC") have filed a joint application requesting certain approvals

related to the proposed transfer of 100% of PGE's common equity from Enron Corporation to

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creditors of Enron and other Debtors. PGE requests a Commission order pursuant to ORS § 757.410 et seq. authorizing PGE to issue 62,500,000 shares of "New PGE Common Stock." SFC requests an order pursuant to ORS § 757.511 authorizing the "Reserve for Disputed Claims" to hold more than five percent of the New PGE Common Stock. The Commission will resolve these requests in Docket Nos. UF 4218 and UM 1206, respectively.

Docket Nos. UF 4218 and UM 1206 both qualify as an Eligible
Proceeding under the IFA. The IFA defines an Eligible Proceeding as "any commission
proceeding that directly affects one or more of the Participating Public Utilities." IFA, Section
1(c). Docket Nos. UF 4218 and UM 1206 will directly affect PGE, which is a Participating
Public Utility under Section 1(k) of the IFA. Therefore, an Issue Fund Grant may be made for
this proceeding under Section 6.1 the IFA.

3. As required by Section 6.2 of the IFA, this Notice of Intent is being filed at the time ICNU is filing its petition to intervene in Docket Nos. UF 4218 and UM 1206.

4. As required by IFA Section 6.2, this Notice of Intent is being served on each affected Participating Public Utility, all pre-certified organizations, and all parties identified on the service list in Docket Nos. UF 4218 and UM 1206.

5. ICNU identifies the PGE Issue Fund Account as the account from which ICNU intends to request the Issue Fund Grant.

ICNU has been pre-certified under Sections 5.1 and 5.2 of the IFA and
OAR § 860-017-0050(3), as eligible to receive an Issue Fund Grant, by Commission Order No.
03-502, which was entered on August 1, 2003.

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7. ICNU requests that the Commission establish a deadline by which ICNU

must file a proposed budget with respect to the Issue Fund Grant, as provided in Section 6.3 of

the IFA.

Dated this 6th day of July, 2005.

Respectfully submitted,

# DAVISON VAN CLEVE, P.C.

<u>/s/ Melinda J. Davison</u> Melinda J. Davison Matthew Perkins Davison Van Cleve, P.C. 333 SW Taylor, Suite 400 Portland, Oregon 97204 (503) 241-7242 phone (503) 241-8160 facsimile mjd@dvclaw.com Of Attorneys for Industrial Customers of Northwest Utilities

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DAVISON VAN CLEVE, P.C. 333 SW Taylor, Suite 400 Portland, OR 97204 Telephone: (503) 241-7242