

McDowell & Rackner PC



LISA F. RACKNER
Direct (503) 595-3925
lisa@mcd-law.com

May 16, 2007

VIA ELECTRONIC FILING

PUC Filing Center
Public Utility Commission of Oregon
PO Box 2148
Salem, OR 97308-2148

Re: Docket DR 10/UE 88/UM 989

Enclosed for filing is Idaho Power Company's Petition to Intervene in the above-referenced proceedings. A copy of this filing has been served on all parties to these proceedings.

Very truly yours,

A handwritten signature in black ink, appearing to read "Lisa F. Rackner", followed by a small mark that looks like a stylized "L" or "R".

Lisa F. Rackner

Enclosures

cc: Service List

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

DR 10/UE 88/UM 989

In the Matters of
The Application of Portland General Electric
Company for an Investigation into Least
Cost Plan Plant Retirement, (DR 10)
Revised Tariffs Schedules for Electric
Service in Oregon Filed by Portland
General Electric Company, (UE 88)
Portland General Electric Company's
Application for an Accounting Order and for
Order Approving Tariff Sheets Implementing
Rate Reduction. (UM 989)

**IDAHO POWER COMPANY'S PETITION
TO INTERVENE
(and Waiver of Paper Service)**

Pursuant to ORS 756.525 and OAR 860-0012-0001, Idaho Power Company ("Idaho Power") petitions the Public Utility Commission of Oregon (the "Commission") to intervene in this proceeding with full party status as described in OAR 860-011-0035. In support of this petition, Idaho Power states:

1.

Idaho Power is an electric public utility operating in the state of Oregon and is subject to the supervision and regulation of the Commission.

2.

Idaho Power wishes to waive paper service in this docket. Communications to Idaho Power concerning this proceeding should be addressed to:

IDAHO POWER COMPANY	
BART KLINE	MONICA MOEN
bkline@idahopower.com	mmoen@idahopower.com
MIKE YOUNGBLOOD	RIC GALE
myoungblood@idahopower.com	rgale@idahopower.com
LISA NORDSTROM	
lnordstrom@idahopower.com; and to:	

1 MCDOWELL & RACKNER PC
2 LISA F. RACKNER
3 lisa@mcd-law.com

KIMBERLY PERRY
kim@mcd-law.com

3.

4 Idaho Power has a direct and substantial interest in this proceeding, in which the
5 Commission has announced it will immediately begin an investigation into its delegated
6 authority to engage in retroactive ratemaking. *In re Application of Portland General Electric*
7 *Co. for an Investigation into Least Cost Plan Plant Retirement*, DR 10/UE 88/UM 989, Order
8 07-157 at 9 (OPUC Apr. 19, 2007). Recognizing the direct and substantial interest utilities
9 like Idaho Power have in this proceeding, the Commission has observed that, "[g]iven the
10 generality and breadth of this issue, we expect that other parties, in addition to those now
11 active in these joint remand proceedings, will want to participate." *Id.*

4.

13 Idaho Power has experience with Commission investigations. Idaho Power's
14 participation in this docket could assist the Commission in resolving the issues. Idaho
15 Power will not unreasonably broaden the issues, burden the record, or unreasonably delay
16 the proceedings.

5.

18 Because no other party can adequately represent Idaho Power's interests in this
19 proceeding, Idaho Power respectfully requests that the Commission grant this Petition to
20 Intervene.

21 DATED: May 16, 2007.

22 McDOWELL & RACKNER PC

23
24 
25 Lisa F. Rackner

26 Attorneys for Idaho Power Company

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing document in Docket DR 10/UE 88/UM 989 on the following named person(s) on the date indicated below by email and first-class mail addressed to said person(s) at his or her last-known address(es) indicated below.

Stephanie S. Andrus
Department of Justice
Regulated Utility & Business Section
1162 Court St NE
Salem OR 97301-4096
stephanie.andrus@state.or.us

Lowrey R. Brown
Citizens' Utility Board of Oregon
lowrey@oregoncub.org

J. Jeffrey Dudley
Portland General Electric
121 SW Salmon St 1WTC1300
Portland OR 97204
jay.dudley@pgn.com

Jason Eisdorfer
Citizens' Utility Board of Oregon
jason@oregoncub.org

Paul Graham
Department of Justice
Regulated Utility & Business Section
1162 Court St NE
Salem OR 97301-4096
paul.graham@state.or.us

Patrick G. Hager
Portland General Electric
121 SW Salmon St 1WTC0702
Portland OR 97204
Patrick.hager@pgn.com


Robert Jenks
Citizens' Utility Board of Oregon
bob@oregoncub.org

Daniel W. Meek
Attorney at Law
10949 SW 4th Ave
Portland OR 97219
dan@meek.net

Rates & Regulatory Affairs
Portland General Electric
121 SW Salmon St 1WTC0702
Portland OR 97204
pge.opuc.filings@pgn.com

Linda K. Williams
Kafoury & McDougal
10266 SW Lancaster Rd
Portland OR 97219-6305
linda@lindawilliams.net

DATED: May 16, 2007.



Lisa F. Rackner

Of Attorneys for Idaho Power Company