# Davison Van Cleve PC

Altorneys at Law TEL (503) 241-7242 • FAX (503) 241-8160 • mail@dvclaw.com Suite 400 333 S.W. Taylor Portland, OR 97204

April 8, 2005

Via US Mail

Public Utility Commission Attn: Filing Center 550 Capitol St. NE #215 P.O. Box 2148 Salem OR 97308-2148

#### In the Matter of PORTLAND GENERAL ELECTRIC COMPANY Re: 2006 Resource Valuation Mechanism Docket No. UE 172

Dear Filing Center:

Enclosed please find the original and two copies of the Petition to Intervene of the Industrial Customers of Northwest Utilities in the above-captioned 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 service list,

shown below, by causing the same to be mailed, postage-prepaid, through the U.S. Mail.

Dated at Portland, Oregon, this 8th day of April, 2005.

<u>/s/ Christian Griffen</u> Christian W. Griffen

STEPHANIE S ANDRUS DEPARTMENT OF JUSTICE REGULATED UTILITY & BUSINESS SECTION 1162 COURT ST NE SALEM OR 97301-4096 stephanie.andrus@state.or.us	DOUGLAS C TINGEY PORTLAND GENERAL ELECTRIC 121 SW SALMON 1WTC13 PORTLAND OR 97204 doug.tingey@pgn.com
--	---

### **BEFORE THE PUBLIC UTILITY COMMISSION**

#### **OF OREGON**

#### UE 172

In the Matter of	)
PORTLAND GENERAL ELECTRIC COMPANY	) ) PETITION TO INTERVENE OF THE ) INDUSTRIAL CUSTOMERS OF ) NORTHWEST UTILITIES
Adjustments to Schedule 125 (2006 RVM Filing).	) ) )

Pursuant to ORS § 756.525 and OAR § 860-012-0001, the Industrial Customers

of Northwest Utilities ("ICNU") petitions the Oregon Public Utility Commission

("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:

Ken Canon Industrial Customers of Northwest Utilities 825 N.E. Multnomah, Suite 180 Portland, OR 97232

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 attorney and consultant

at the following addresses:

PAGE 1 - PETITION TO INTERVENE OF ICNU

S. Bradley Van Cleve Davison Van Cleve, P.C. 333 S.W. Taylor Suite 400 Portland, OR 97204 E-Mail: <u>mail@dvclaw.com</u> Telephone: (503) 241-7242 Facsimile: (503) 241-8160 Randall J. Falkenberg RFI Consulting, Inc. PMB 362 8351 Roswell Road Atlanta, GA 30350 Email: <u>consultrfi@aol.com</u> Telephone: (770) 379-0505 Facsimile: (770) 671-1046

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 members of ICNU are customers of PGE as indicated on Attachment A.

4. ICNU has a substantial interest in the impacts of PGE's annual adjustment to the Resource Valuation Mechanism set forth in Schedule 125. The Commission approved Schedule 125 when it approved the Power Cost Stipulation in Docket No. UE 115. ICNU was a party to that Stipulation and fully participated in Docket No. UE 115. ICNU was also a participant in the proceedings considering PGE's annual adjustment to the Resource Valuation Mechanism conducted in 2002 (Docket No. UE 139), 2003 (Docket No. UE 149), and 2004 (Docket No. UE 161). PGE's annual revisions will affect the rates for service that PGE provides to ICNU's members.

5. ICNU represents the interests of many of PGE's largest customers. ICNU's intervention in these proceedings will assist the Commission in resolving the issues in this proceeding and will not unreasonably broaden the issues, burden the record, or delay this proceeding.

#### PAGE 2 - PETITION TO INTERVENE OF ICNU

DAVISON VAN CLEVE, P.C. 333 S.W. Taylor, Suite 400 Portland, OR 97204 Telephone: (503) 241-7242 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 8th day of April, 2005.

Respectfully submitted,

# DAVISON VAN CLEVE, P.C.

<u>/s/ S. Bradley Van Cleve</u> S. Bradley Van Cleve Davison Van Cleve, P.C. 333 S.W. Taylor, Suite 400 Portland, Oregon 97204 (503) 241-7242 phone (503) 241-8160 facsimile mail@dvclaw.com Of Attorneys for Industrial Customers of Northwest Utilities

### PAGE 3 - PETITION TO INTERVENE OF ICNU

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

#### 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 Structurals, Inc.\* Ponderay Newsprint Co Shell Oil Products US Simpson Paper Simpson Timber Solar Grade Silicon LLC Tesoro Refining and Marketing Co. Wah Chang West Linn Paper Company\* Weyerhaeuser\*

\*Denotes PGE Customers