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**Via Electronic Mail and
Overnight Mail**

March 13, 2006

Public Utility Commission of Oregon
550 Capitol Street NE, Suite 215
Salem, Oregon 97310
Attn: Kim Resch

Re: Case No. UE-179

Dear Ms. Resch:

Please find enclosed the original and five copies of the Petition to Intervene of the Fred Meyers Stores and Quality Food Centers, Divisions Of Kroger Co. in the above referenced matter.

Copies have been served on all parties of record. Please place this document of file.

Very truly yours,

A handwritten signature in black ink, appearing to read 'MKurtz', is written over the typed name of Michael L. Kurtz.

Michael L. Kurtz, Esq.
Kurt J. Boehm, Esq.
BOEHM, KURTZ & LOWRY

MLKkew
Enclosure
cc: Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that true copy of the foregoing was served via regular mail, (unless otherwise noted), this 13th day of March, 2006.

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**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 179

In The Matter Of
PACIFICORP'S FILING OF REVISED
TARIFF SCHEDULES

PETITION TO INTERVENE OF
FRED MEYER STORES AND
QUALITY FOOD CENTERS,
DIVISIONS OF KROGER CO.

NAME OF PETITIONER: Fred Meyer Stores and Quality Food Centers, Divisions Of Kroger Co.
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ADDRESS: 1014 Vine Street, G-07, Cincinnati, Ohio 45202
--

PHONE NUMBER: 513-762-4538

FAX NUMBER: 513-762-4012

E-MAIL ADDRESS: dgeorge@kroger.com

NAME OF COUNSEL FOR PETITIONER: Michael L. Kurtz, Esq., and Kurt J. Boehm, Esq., Boehm, Kurtz & Lowry
--

COUNSEL'S ADDRESS: 36 East Seventh Street., Suite 1510, Cincinnati, OH 45202

COUNSEL'S PHONE NUMBER: 513-421-2255

COUNSEL'S FAX NUMBER: 513-421-2764

COUNSEL'S E-MAIL ADDRESS: mkurtz@bkllawfirm.com, kboehm@bkllawfirm.com

IF THE PETITIONER IS AN ORGANIZATION, THE NUMBER OF MEMBERS IN AND THE PURPOSES OF THE ORGANIZATION:

The Petitioner is seeking intervention on its own behalf as a customer of Pacific Power & Light. Petitioner is not seeking intervention in this matter as a member of a trade group or other organization.

NATURE AND EXTENT OF THE PETITIONER'S INTEREST IN THE PROCEEDING:
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Petitioner operates approximately 14 grocery and discount department stores in the service territory of Pacific Power & Light. The total load of Petitioner is approximately 10 MW. The rate increase requested by the Applicant, if approved, would result in a significant rate increase for Petitioner. Petitioner has a substantial and diverse interest in the outcome of this case that cannot be adequately represented by any other party.

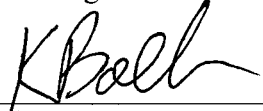
THE ISSUES THE PETITIONER INTENDS TO RAISE AT THE PROCEEDING:

The primary issue Fred Meyer intends to address in this case will be whether the rate increase sought by the Applicant is reasonable and cost justified. We also intend to address whether the proposed allocation of the rate increase and the design of the new rates are just and reasonable.

ANY SPECIAL KNOWLEDGE OR EXPERTISE OF THE PETITIONER THAT WOULD ASSIST THE COMMISSION IN RESOLVING THE ISSUES IN THE PROCEEDING:

Kroger Co., the owner of Fred Meyer Stores and Quality Food Centers, operates in 31 states and has approximately 3500 locations nationwide. Petitioner's regulatory counsel has extensive experience in all facets of electricity law. We expect to retain expert witnesses as necessary. This broad familiarity with ratemaking policy gives Petitioner special expertise that will assist the Commission in deciding the issues in this proceeding.

Based on the information provided above in accordance with the Commission's rules of procedure, Fred Meyer Stores and Quality Food Centers requests to participate in this proceeding as an intervenor. Petitioner represents that it will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding. OAR 860-013-0021.



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3/13/06

Date