



## Department of Energy

Bonneville Power Administration  
P.O. Box 3621  
Portland, Oregon 97208-3621

GENERAL COUNSEL

March 30, 2006

In reply refer to: LC-7

VIA FEDERAL EXPRESS

Hon. Christina M. Smith, ALJ  
Public Utility Commission of Oregon  
550 Capitol Street, N.E. Suite 215  
Salem, Oregon 97301-2551

Re: Application of Portland General Electric Company for a General Rate Increase  
Oregon PUC Docket UE 180  
Petition to Intervene of the Bonneville Power Administration

Dear Judge Smith:

Enclosed for filing are an original and five copies (plus one additional copy) of the Petition to Intervene of the Bonneville Power Administration ("BPA") in the above-referenced OPUC Docket UE 180. If you could please accept this intervention for filing, and cause the extra copy to be conformed (date stamped) and returned to me in the enclosed postage-prepaid envelope, it would be greatly appreciated.

BPA intends to participate in the prehearing conference in this docket scheduled for 1:30 p.m. on Tuesday, April 4, 2006.

Sincerely,

A handwritten signature in black ink, appearing to read "G. M. Kronick", is written over the typed name.

Geoffrey M. Kronick  
Of Attorneys for the Bonneville Power Administration

Cc: Service List

1 **BEFORE THE PUBLIC UTILITY COMMISSION**  
2  
3 **OF OREGON**

4  
5 UE 180  
6

7 In the Matter of  
8

9 PORTLAND GENERAL ELECTRIC COMPANY )  
10 Request for A General Rate Increase )

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12 )  
13 )  
14 ) Petition to Intervene of the  
15 ) Bonneville Power Administration  
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18 Honorable Christina M. Smith, ALJ  
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21 The Bonneville Power Administration (“BPA”), a Federal power-marketing agency  
22 within the U.S. Department of Energy, submits this petition for party status in the above  
23 referenced proceeding pursuant to ORS 756.525 and OAR 860-012-0001. In support of this  
24 request, Petitioner BPA notes the following:

25 1. The business address of BPA is Routing LC-7, 905 NE 11<sup>th</sup> Avenue, P.O. Box 3621,  
26 Portland, Oregon 97208-3621.

27 2. If this petition is granted, BPA will be represented by its attorney, Geoffrey M. Kronick,  
28 Routing LC-7, Office of General Counsel, Bonneville Power Administration, P.O. Box  
29 3621, Portland, OR 97028-3621.

30 3. BPA is a party to a contract with the Eugene Water & Electric Board (“EWEB”), BPA  
31 Contract No. 14-03-09181, executed October 5, 1970. Under this contract, EWEB  
32 assigned its partial 30 percent share of the electric power generation from the Trojan  
33 Nuclear Plant to BPA, such portion having been obtained through EWEB’s contract with

1 Portland General Electric (“PGE”), the majority share owner and operator of the Trojan  
2 Nuclear Plant (“Trojan”). In consideration of this assignment, BPA agreed to offset any  
3 payments that would otherwise be due to BPA by EWEB (for the purchase of other  
4 electric power and related electric transmission services) in an amount equal to EWEB’s  
5 share of the costs of Trojan. Although the Trojan plant is now terminated, there remains  
6 an obligation for payment of certain costs relating to the decommissioning of the Trojan  
7 nuclear plant, costs which should be equitably borne by all participants in Trojan in  
8 proportion to their allocated shares.

9 BPA’s current estimates of PGE’s pro-rata share obligation for these  
10 decommissioning costs are roughly \$45 million (in 1997 dollars) for the period of PGE  
11 Fiscal Years (“FYs”) 2004-2006, \$2.8 million (in 1997 dollars) annually for spent fuel  
12 storage operations for each year in the period of PGE’s FYs 2004-2018 (this will be  
13 dependent, however, on when such spent nuclear fuel is accepted by the Department of  
14 Energy), and \$22 million (in 1997 dollars) for non-radiological remediation and building  
15 demolition work during the period of PGE’s FYs 2017-2018. Lest some other method of  
16 cost allocation of these decommissioning costs potentially be required of EWEB, and in  
17 turn BPA (due to the nature of its agreement with EWEB under the “Net-billing  
18 Agreement”), the financial ability of PGE to meet this decommissioning obligation must  
19 be assured. BPA’s purpose in intervening in this proceeding is largely to assure that PGE  
20 remains financially “healthy” and able to appropriately and timely discharge its portion of  
21 the decommissioning obligation for the Trojan plant.

- 22 4. BPA’s designated attorneys and representative upon whom service of documents may be  
23 made in this proceeding is:

1 Geoffrey M. Kronick, Esq.  
2 gmkronick@bpa.gov  
3 Office of General Counsel – Routing LC-7  
4 Bonneville Power Administration  
5 P O Box 3621  
6 Portland, OR 97208-3621 (1 copy)  
7 Phone: (503) 230-4201  
8 Facsimile: (503) 230-7405  
9

10 and

11  
12 Mr. Craig M. Smith  
13 cmsmith@bpa.gov  
14 Bonneville Power Administration – Routing L-7  
15 P O Box 3621  
16 Portland, OR 97208-3621 (1 copy)  
17  
18

19 5. BPA's appearance and participation will not unreasonably broaden the issues, burden the  
20 record, or unreasonably delay the proceeding.  
21

22 WHEREFORE, for good cause shown, BPA requests that the presiding Administrative Law  
23 Judge grant BPA party status in the instant proceeding.

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25 Respectfully submitted this 30<sup>th</sup> Day of March, 2006.  
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31 \_\_\_\_\_  
32 Geoffrey M. Kronick OSB # 85260  
33 Of Attorneys for the Bonneville Power Administration  
34 Routing LC-7  
35 P O Box 3621  
36 Portland, OR 97208-3621  
37 Phone: (503) 230-4201  
Facsimile: (503) 230-7405

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

UE 180

In the Matter of

PORTLAND GENERAL ELECTRIC COMPANY )	
Request for A General Rate Increase )	Petition to Intervene of the
)	Bonneville Power Administration
)	
)	

CERTIFICATE OF SERVICE

I, Geoffrey M. Kronick, caused the foregoing "Petition to Intervene of the Bonneville Power Administration" to be served upon the Administrative Law Judge in this instant proceeding by causing an original and five true copies to be routed via Federal Express overnight delivery service to the Administrative Law Judges' offices at the Public Utility Commission of Oregon, 550 Capitol Street, N.E. Suite 215, Salem, Oregon 97301-2551; and a single true copy to be served upon the representatives of all parties indicated on the Official Service List compiled in this proceeding by causing such copies to be deposited, postage prepaid, in a receptacle maintained by the United States Postal Service for the receipt of mail, addressed to the following:

S. Bradley Van Cleve  
Matthew W. Perkins  
Davison Van Cleve, P.C.  
333 S.W. Taylor, Ste. 400  
Portland, OR 97204

James T. Selecky  
Brubaker & Associates  
1215 Fern Ridge Pkwy  
Suite 208  
St. Louis, MO 63141

Jason G. Eisdorfer  
Citizens' Utility Board of Oregon  
610 SW Broadway, Suite 308  
Portland, OR 97205

Lowrey R. Brown  
Citizens' Utility Board of Oregon  
610 SW Broadway, Suite 308  
Portland, OR 97205

Douglas C. Tingey  
Portland General Electric Company  
121 SW Salmon Street, 1WTC13  
Portland, OR 97204

Portland General Electric  
Rates and Regulatory Affairs  
121 SW Salmon Street, 1WTC0702

Stephanie S. Andrus  
Asst. Attorney General  
Regulated Utility & Business Section  
1162 Court Street, N.E.  
Salem, OR 97301-4096

I have also served copies of the foregoing "Petition of the Bonneville Power Administration to Intervene" in this proceeding by routing a copy via electronic mail to each party indicated on the current service list maintained by the Oregon Public Utility Commission in this proceeding.

Dated this 30<sup>th</sup> Day of March, 2006.



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Geoffrey M. Kronick, OSB # 85260  
Of Attorneys for the Bonneville Power Administration  
Routing LC-7  
P. O. Box 3621  
Portland, OR 97208-3621  
(503) 230-4201

CERTIFICATE OF SERVICE

BONNEVILLE POWER ADMINISTRATION PETITION TO INTERVENE - UE-180