

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

UE 180/UE 181

In the Matters of
PORTLAND GENERAL ELECTRIC
COMPANY
Request for a General Rate Revision
(UE 180), and

PORTLAND GENERAL ELECTRIC
COMPANY
2007 Resource Valuation Mechanism
(UE 181).

ERRATA TO PETITION TO
INTERVENE OF
CONSTELLATION NEWENERGY, INC.

Pursuant to ORS § 756.525 and OAR § 860-012-0001, Constellation NewEnergy, Inc. (“CNE”) respectfully petitions the Oregon Public Utility Commission (“Commission”) to intervene in the above-captioned, consolidated proceedings with full party status as described in OAR § 860-011-0035(5). In support of this petition, CNE represents as follows:

1. CNE’s business address is:

Greg Kosier
Constellation NewEnergy, Inc.
350 South Grand Avenue, Suite 3800
Los Angeles, CA 90071

2. For purposes of CNE’s participation in these proceedings, all documents relating to these proceedings should be served on CNE’s representatives at the following addresses:

Bill Chen
Director of Regulatory Affairs
Constellation NewEnergy, Inc.
2175 N. California Boulevard, Suite 300
Walnut Creek, CA 94596
Telephone: (925) 287-4703
Facsimile: (925) 287-4501
E-Mail: bill.chen@constellation.com

~~David I. Fein
Senior Regulatory Counsel
Constellation NewEnergy, Inc.
550 West Washington Blvd., Suite 300
Chicago, IL 60661
Telephone: (312) 704-8499
Facsimile: (312) 795-9270
Mobile: (312) 446-2882~~

~~E-Mail: david.fein@constellation.com~~

3. CNE is a Commission-certified Scheduling Electricity Service Supplier (“ESS”) in the state of Oregon and has been serving large non-residential customers in the service territory of Portland General Electric (“PGE”) since January 1, 2005.
4. CNE is a leading national competitive energy supplier that serves commercial, industrial, and governmental customers, including more than two-thirds of the Fortune 100, representing more than 15,000 megawatts of peak electric load in sixteen states, Washington, D.C. and two Canadian provinces.
5. CNE is a wholly-owned subsidiary of Constellation Energy, a Fortune 205 company based in Baltimore, Maryland, with a market capitalization of \$8.8 billion and over 9,000 employees.
6. As the provider of electricity to PGE’s large non-residential customers through direct access, CNE has a unique and substantial interest in PGE’s application to revise its electricity rates. The proposed rate changes could substantially and directly affect CNE’s business in PGE’s service territory by impacting the future viability of direct access for CNE’s existing customers as well as for other eligible direct access customers in PGE’s service territory.
7. CNE’s intervention in this proceeding will assist the Commission in resolving the issues in these proceedings and will not unreasonably broaden the issues, burden the record, or unreasonably delay these proceedings.
8. As described above, CNE has a direct and substantial interest in these proceedings that cannot 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 CNE to intervene in this proceeding.

WHEREFORE, CNE respectfully requests that the Commission grant its petition to intervene with full party status in this proceeding.

Dated this 18th day of May, 2006.

Respectfully submitted,

/s/ Bill Chen

Bill Chen

Director of Regulatory Affairs

Constellation NewEnergy, Inc.

2175 N. California Boulevard, Suite 300

Walnut Creek, CA 94596

Telephone: (925) 287-4703

Facsimile: (925) 287-4501

E-Mail: bill.chen@constellation.com

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing ERRATA TO PETITION TO INTERVENE OF CONSTELLATION NEWENERGY, INC. to:

Public Utility Commission of Oregon
Attn: Filing Center
P.O. Box 2148
Salem, OR 97308-2148

on the 18th day of May, 2006, by electronic mail and by sending via overnight FedEx delivery the original and two copies of said document at Walnut Creek, California on said day.

I further certify that I served a copy of the foregoing ERRATA TO PETITION TO INTERVENE OF CONSTELLATION NEWENERGY, INC. on the individuals listed below, by electronic mail, or when paper service was not waived, by U.S. mail, postage prepaid on said day.

	JIM DEASON ATTORNEY AT LAW	521 SW CLAY ST STE 107 PORTLAND OR 97201-5407 jimdeason@comcast.net
--	-------------------------------	---

ROBERT VALDEZ
PO BOX 2148
SALEM OR 97308-2148
bob.valdez@state.or.us

	AF LEGAL & CONSULTING SERVICES	
--	---	--

	ANN L FISHER ATTORNEY AT LAW	2005 SW 71ST AVE PORTLAND OR 97225-3705 energlaw@aol.com
--	---------------------------------	--

BOEHM KURTZ & LOWRY

KURT J BOEHM (Q)
ATTORNEY
36 E SEVENTH ST - STE 1510
CINCINNATI OH 45202
kboehm@bkllawfirm.com

	BOEHM, KURTZ & LOWRY	
--	---------------------------------	--

	MICHAEL L KURTZ (Q)	36 E 7TH ST STE 1510 CINCINNATI OH 45202-4454 mkurtz@bkllawfirm.com
--	---------------------	---

BONNEVILLE POWER ADMINISTRATION

GEOFFREY M KRONICK
LC7 (Q)
PO BOX 3621
PORTLAND OR 97208-3621

gmkronick@bpa.gov

	CRAIG SMITH	PO BOX 3621--L7 PORTLAND OR 97208-3621 cmsmith@bpa.gov
--	-------------	--

**BRUBAKER & ASSOCIATES,
INC.**

JAMES T SELECKY (Q)

1215 FERN RIDGE PKWY, SUITE
208
ST. LOUIS MO 63141
jtselecky@consultbai.com

	CABLE HUSTON BENEDICT HAAGENSEN & LLOYD LLP	
--	--	--

	TAMARA FAUCETTE	1001 SW 5TH AVE STE 2000 PORTLAND OR 97204 tfaucette@chbh.com
--	-----------------	---

**CABLE HUSTON BENEDICT
HAAGENSEN & LLOYD, LLP**

CHAD M STOKES

1001 SW 5TH - STE 2000
PORTLAND OR 97204
cstokes@chbh.com

	CITIZENS' UTILITY BOARD OF OREGON	
--	--	--

	LOWREY R BROWN (Q) UTILITY ANALYST	610 SW BROADWAY - STE 308 PORTLAND OR 97205 lowrey@oregoncub.org
--	---------------------------------------	--

JASON EISDORFER (Q)
ENERGY PROGRAM
DIRECTOR

610 SW BROADWAY STE 308
PORTLAND OR 97205
jason@oregoncub.org

	COMMUNITY ACTION DIRECTORS OF OREGON	
--	---	--

	JIM ABRAHAMSON (Q) COORDINATOR	PO BOX 7964 SALEM OR 97303-0208 jim@cado-oregon.org
--	-----------------------------------	---

**CONSTELLATION
NEWENERGY INC**

WILLIAM H CHEN
REGULATORY CONTACT

2175 N CALIFORNIA BLVD STE
300
WALNUT CREEK CA 94596
bill.chen@constellation.com

	DANIEL W MEEK ATTORNEY AT LAW	
--	--	--

	DANIEL W MEEK ATTORNEY AT LAW	10949 SW 4TH AVE PORTLAND OR 97219 dan@meek.net
--	----------------------------------	---

DAVISON VAN CLEVE PC

S BRADLEY VAN CLEVE (Q) 333 SW TAYLOR - STE 400
PORTLAND OR 97204
mail@dvclaw.com

	DEPARTMENT OF JUSTICE	
	STEPHANIE S ANDRUS (Q) ASSISTANT ATTORNEY GENERAL	REGULATED UTILITY & BUSINESS SECTION 1162 COURT ST NE SALEM OR 97301-4096 stephanie.andrus@state.or.us

**EPCOR MERCHANT & CAPITAL
(US) INC**

LORNE WHITTLES 1161 W RIVER ST STE 250
MGR, PNW MARKETING BOISE ID 83702
lwhittles@epcor.ca

	KAFOURY & MCDUGAL	
	LINDA K WILLIAMS ATTORNEY AT LAW	10266 SW LANCASTER RD PORTLAND OR 97219-6305 linda@lindawilliams.net

LEAGUE OF OREGON CITIES

ANDREA FOGUE PO BOX 928
SENIOR STAFF ASSOCIATE 1201 COURT ST NE STE 200
SALEM OR 97308
afogue@orcities.org

	LEBOEUF LAMB GREENE & MACRAE LLP	
	SCOTT H DEBROFF	200 N 3RD ST, STE 300 HARRISBURG PA 17108-2105 sdebroy@llgm.com

MCDOWELL & ASSOCIATES PC

KATHERINE A MCDOWELL 520 SW SIXTH AVENUE, SUITE
830
PORTLAND OR 97204
katherine@mcd-law.com

W	NORTHWEST ECONOMIC RESEARCH INC	
	LON L PETERS	607 SE MANCHESTER PLACE PORTLAND OR 97202 lpeters@pacifier.com

NORTHWEST NATURAL

ELISA M LARSON (Q) 220 NW 2ND AVE
ASSOCIATE COUNSEL PORTLAND OR 97209
elisa.larson@nwnatural.com

	NORTHWEST NATURAL GAS COMPANY	
	ALEX MILLER (Q) DIRECTOR, REGULATORY AFFAIRS	220 NW SECOND AVE PORTLAND OR 97209-3991 alex.miller@nwnatural.com
	OREGON ENERGY COORDINATORS ASSOCIATION	
	KARL HANS TANNER (Q) PRESIDENT	2448 W HARVARD BLVD ROSEBURG OR 97470 karl.tanner@ucanap.org
	PACIFICORP	
	LAURA BEANE MANAGER, REGULATION	825 MULTNOMAH STE 800 PORTLAND OR 97232-2153 laura.beane@pacificorp.com
W	PORTLAND CITY OF - OFFICE OF CITY ATTORNEY	
	BENJAMIN WALTERS DEPUTY CITY ATTORNEY	1221 SW 4TH AVE - RM 430 PORTLAND OR 97204 bwalters@ci.portland.or.us
W	PORTLAND CITY OF - OFFICE OF TRANSPORTATION	
	RICHARD GRAY STRATEGIC PROJECTS MGR/SMIF ADMINISTRATOR	1120 SW 5TH AVE RM 800 PORTLAND OR 97204 richard.gray@pdxtrans.org
W	PORTLAND CITY OF ENERGY OFFICE	
	DAVID TOOZE ENERGY PROGRAM MANAGER	721 NW 9TH AVE -- SUITE 350 PORTLAND OR 97209-3447 dtooze@ci.portland.or.us
	PORTLAND GENERAL ELECTRIC	
	RATES & REGULATORY AFFAIRS	RATES & REGULATORY AFFAIRS 121 SW SALMON ST 1WTC0702 PORTLAND OR 97204 pge.opuc.filings@pgn.com
	DOUGLAS C TINGEY (Q)	121 SW SALMON 1WTC13 PORTLAND OR 97204 doug.tingey@pgn.com
	PRESTON GATES ELLIS LLP	
	HARVARD P SPIGAL	222 SW COLUMBIA ST STE 1400 PORTLAND OR 97201-6632 hspigal@prestongates.com

SEMPRA GLOBAL

THEODORE E ROBERTS

101 ASH ST HQ 13D
SAN DIEGO CA 92101-3017
troberts@sempra.com

LINDA WRAZEN

101 ASH ST, HQ8C
SAN DIEGO CA 92101-3017
lwrazen@sempraglobal.com

DATED this 18th day of May, 2006.

/s/ Bill Chen

Bill Chen
Director of Regulatory Affairs
Constellation NewEnergy, Inc.