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April 5, 2007

Via Electronic and U.S. 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 Request for to Re: Add Schedule 111, Advanced Metering Infrastructure (AMI). Docket No. UE 189

Dear Filing Center:

Enclosed please find the original and two copies of the Petition to Intervene on behalf of the Industrial Customers of Northwest Utilities in the above-referenced matter.

Please return one file-stamped copy in the postage-prepaid envelope provided. Thank you for your assistance.

Sincerely,

/s/ Ruth A. Miller Ruth A. Miller

Enclosures Service List cc:

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,

by causing the same to be electronically emailed, in addition to deposited in the U.S. Mail,

postage-prepaid.

Dated at Portland, Oregon, this 5th day of April, 2007.

/s/ Ruth A. Miller

Ruth A. Miller

CITIZEN'S UTILTY BOARD OF OREGON LOWRY R BROWN

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BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UE 189

In the Matter of)
) PETITION TO INTERVENE OF THE
PORTLAND GENERAL ELECTRIC) INDUSTRIAL CUSTOMERS OF
COMPANY) NORTHWEST UTILITIES
)
Request to Add Schedule 111, Advanced)
Metering Infrastructure (AMI).	_)

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

of Northwest Utilities ("ICNU") hereby 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:

Michael Early Industrial Customers of Northwest Utilities 333 S.W. Taylor, Suite 400 Portland, OR 97204

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 attorneys at the

following addresses:

S. Bradley Van Cleve Matthew W. Perkins Davison Van Cleve, P.C. 333 S.W. Taylor, Suite 400 Portland, OR 97204 E-Mail: mail@dvclaw.com Telephone: (503) 241-7242 Facsimile: (503) 241-8160

PAGE 1 – PETITION TO INTERVENE OF ICNU

DAVISON VAN CLEVE, P.C. 333 S.W. Taylor, Suite 400 Portland, OR 97204 Telephone: (503) 241-7242 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 Portland General Electric Company ("PGE"), as indicated on Attachment A.

4. ICNU has a substantial interest in the impacts of PGE's application for revised tariffs. The proposed rate change would substantially and directly affect those of ICNU's members who purchase power from PGE. ICNU requests leave to intervene in this Docket to represent its members who are affected by the proposed rate increase.

5. ICNU represents the interests of many of PGE's largest customers. ICNU participated in PGE's most recent general rate case, Docket No. UE 180, as well as numerous other proceedings that affected PGE's rates. ICNU's intervention in this proceeding will assist the Commission in resolving the issues in this proceeding and will not unreasonably broaden the issues, burden the record, or unreasonably delay this proceeding.

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.

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DAVISON VAN CLEVE, P.C. 333 S.W. Taylor, Suite 400 Portland, OR 97204 Telephone: (503) 241-7242 WHEREFORE, ICNU respectfully requests that the Commission grant its petition

to intervene with full party status in this proceeding.

Dated this 5th day of April, 2007.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

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

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ATTACHMENT A INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

Air Liquide Air Products Amcor PET Packaging USA, Inc. BPB Gypsum, Inc. *Blue Heron Paper Company *Boeing *Boise Cascade Dyno Nobel, Inc. **ConAgra** Foods Eka Chemicals, Inc. Emerald Kalama Chemical, LLC **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 *Oregon Steel Mills *PCC Structurals, Inc. Ponderay Newsprint Co Shell Oil Products US Simpson Paper Simpson Timber Solar Grade Silicon LLC *SP Newsprint Tesoro Refining and Marketing Co. Wah Chang *West Linn Paper Company *Weyerhaeuser

*Denotes PGE Customers