BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UE 208

In the Matter of)	
)	PETITION TO INTERVENE OF THE
PORTLAND GENERAL ELECTRIC)	INDUSTRIAL CUSTOMERS OF
COMPANY)	NORTHWEST UTILITIES
)	
2010 Annual Power Cost Update Tariff)	
(Schedule 125))	

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 and

consultant at the following addresses:

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

Randall Falkenberg RFI Consulting, Inc. 8343 Roswell Road PMB 362 Sandy Springs, GA 30350 E-Mail: consultrfi@aol.com Telephone: (770) 379-0505

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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 2010 Annual Power Cost Update Tariff ("AUT"). The proposed rate change under the terms of PGE's AUT 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 operation of PGE's AUT.

5. ICNU represents the interests of many of PGE's largest customers. ICNU has participated in PGE's prior general rate cases, Docket Nos. UE 180 and UE 197, as well as PGE's most recent net variable power cost proceedings, Docket Nos. UE 181 and UE 198. 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 14th day of April, 2009.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

<u>/s/ S. Bradley Van Cleve</u> S. Bradley Van Cleve 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. (CNC Containers Northwest) Certain Teed Gypsum & Ceiling Manufacturing, Inc. (BPB) *Blue Heron Paper Company *Boeing **Boise Cascade LLC** *Boise Paper **ConAgra** Foods Dyno Nobel, Inc. Eka Chemicals, Inc. **Emerald Performance Materials, LLC** Equa-Chlor, LLC **Evanite Fiber** *Evraz Oregon Steel Mills Freres Lumber Company Georgia-Pacific Grays Harbor Paper, L.P. Hewlett-Packard Inland Empire Paper Co. *Intel **International Paper** *J.R. Simplot Kimberly-Clark Corporation *Linde, Inc. Longview Fibre Microsoft Corporation *Norpac Foods *PCC Structurals, Inc. Ponderay Newsprint **REC Solar Grade Silicon LLC** Shell Oil Products US Simpson Paper & Timber *SP Newsprint Tesoro Refining and Marketing Co. Wah Chang *West Linn Paper Company Weyerhaeuser

*Denotes PGE Customers



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

April 14, 2009

Via Electronic and 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 2010 Re: Annual Power Cost Update Tariff (Schedule 125) Docket No. UE 208

Dear Filing Center:

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

Thank you for your assistance.

Sincerely,

/s/ Brendan E. Levenick Brendan E. Levenick

Enclosures Service List cc:

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing Petition to

Intervene on behalf of the of the Industrial Customers of Northwest Utilities upon the parties, on

the service list, by causing the same to be deposited in the U.S. Mail, postage-prepaid, and via

electronic mail.

Dated at Portland, Oregon, this 14th day of April, 2009.

Sincerely,

<u>/s/ Brendan E. Levenick</u> Brendan E. Levenick

(W) CITIZENS' UTILITY BOARD OF OREGON G. CATRIONA MCCRACKEN (C) ROBERT JENKS (C) 610 SW BROADWAY STE 308 PORTLAND OR 97205 dockets@oregoncub.org bob@oregoncub.org	DEPARTMENT OF JUSTICE STEPHANIE ANDRUS (C) ASSISTANT ATTORNEY 1162 COURT ST NE SALEM OR 97301-4096 stephanie.andrus@state.or.us
OREGON PUBLIC UTILITY COMMISSION ED DURRENBERGER (C) PO BOX 2148 SALEM OR 97308-2148 ed.durrenberger@state.or.us	PORTLAND GENERAL ELECTRIC RANDALL DAHLGREN RATES & REGULATORY AFFAIRS 121 SW SALMON ST 1WTC 0702 PORTLAND OR 97204 pge.opuc.filings@pgn.com
PORTLAND GENERAL ELECTRIC DOUGLAS C TINGEY ASST GENERAL COUNSEL 121 SW SALMON 1WTC13 PORTLAND OR 97204 doug.tingey@pgn.com	