Davison Van Cleve PC

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August 4, 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 to Re:

establish the prices associated with the 2008 Power Cost Variance

Mechanism

Docket No. UE 211

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 4th day of August, 2009.

Sincerely,

/s/ Brendan E. Levenick Brendan E. Levenick

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

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UE 211

In the Matter of)	
PORTLAND GENERAL ELECTRIC)	PETITION TO INTERVENE OF THE
COMPANY)	INDUSTRIAL CUSTOMERS OF
)	NORTHWEST UTILITIES
To establish the prices associated with the)	
2008 Power Cost Variance Mechanism)	

Pursuant to ORS § 756.525 and OAR § 860-012-0001, the Industrial Customers of Northwest Utilities ("ICNU") petitions the Public Utility Commission of Oregon ("Commission") to intervene in this proceeding with full party status as described in OAR § 860-011-0035(6). 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 address:

> S. Bradley Van Cleve Randall J. Falkenberg Jesse E. Cowell RFI Consulting, Inc. Davison Van Cleve, P.C. 8343 Roswell Road 333 S.W. Taylor, Suite 400 PMB 362 Portland, OR 97204 Sandy Springs, GA 30350

E-Mail: mail@dvclaw.com E-Mail: consultrfi@aol.com iec@dvclaw.com Telephone: (770) 379-0505 Facsimile: (770) 671-1046

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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 of ICNU's members are customers of Portland General

Electric ("PGE"), as shown on Attachment A. ICNU represents the interests of many of PGE's

largest customers.

4 On July 1, 2009, PGE filed testimony and new tariffs associated with its

2008 Power Cost Variance ("PCV") Mechanism. The proposed rate change under the terms of

PGE's 2008 PCV Mechanism would substantially and directly affect those of ICNU's members

who purchase power from PGE. As a result, ICNU has a substantial interest in this proceeding.

ICNU requests leave to intervene in this Docket to represent its members who are affected by the

operation of PGE's 2008 PCV Mechanism.

5. ICNU has extensive experience with PGE's rates and with previous

proceedings related to PGE's PCV mechanism. ICNU's intervention in this proceeding will

assist the Commission in resolving the issues and will not unreasonably broaden the issues,

burden the record, or 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

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

Dated this 4th day of August, 2009.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ S. Bradley Van Cleve

S. Bradley Van Cleve
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Of Attorneys for Industrial Customers
of Northwest Utilities

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