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April 12, 2011

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

Re: In the Matter of PORTLAND GENERAL ELECTRIC COMPANY
2012 Annual Power Cost Update Tariff (Schedule 125)
Docket No. UE 228

Dear Filing Center:

Enclosed please find an original and one courtesy copy of the Petition to Intervene on behalf of the Industrial Customers of Northwest Utilities in the above-referenced docket. Thank you for your attention to this matter.

Sincerely yours,

/s/ Sarah A. Kohler
Sarah A. Kohler

Enclosures
cc: Service List

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing Petition to Intervene on behalf 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 where paper service has been waived.

Dated at Portland, Oregon, this 12th day of April, 2011.

/s/ Sarah A. Kohler
Sarah A. Kohler

(W) CITIZENS UTILITY BOARD OF OREGON
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BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UE 228

In the Matter of)
)
PORTLAND GENERAL ELECTRIC) PETITION TO INTERVENE OF THE
COMPANY) INDUSTRIAL CUSTOMERS OF
) NORTHWEST UTILITIES
)
2012 Annual Power Cost Update Tariff)
(Schedule 125))

Pursuant to ORS § 756.525 and OAR § 860-001-0300(2), 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 § 860-001-0010(7). In support of this petition, ICNU represents as follows:

1. The business address of ICNU is:

Michael Early
Industrial Customers of Northwest Utilities
1300 SW 5th Ave, Suite 1750
Portland, OR 97201
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
Irion A. Sanger
Davison Van Cleve, P.C.
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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 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 2012 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, UE 197, and UE 215, as well as PGE’s most recent net variable power cost proceedings, Docket Nos. UE 181, UE 198, and UE 208. 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.

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

Dated this 12th day of April, 2011.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Irion A. Sanger

S. Bradley Van Cleve

Irion A. Sanger

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Of Attorneys for the Industrial Customers of
Northwest Utilities

INDUSTRIAL
CUSTOMERS OF
NORTHWEST
UTILITIES

MICHAEL B. EARLY
EXECUTIVE DIRECTOR

ATTACHMENT A
INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

Air Liquide
Air Products
Ampcor Rigid Plastics
Certain Teed Gypsum & Ceiling Manufacturing, Inc. (BPB)
Boeing**
Boise Cascade LLC
Boise Paper**
ConAgra Foods
D R Johnson Lumber Company
Dyno Nobel, Inc.
Eka Chemicals, Inc.
Emerald Performance Materials, LLC
Equa-Chlor, LLC
Evraz, Inc.**
Freres Lumber Co.
Georgia-Pacific
Grays Harbor Paper, L.P.
Hewlett-Packard
Inland Empire Paper Co.
Intel**
International Paper
JR Simplot**
Kimberly-Clark Corporation
Linde, Inc.**
Longview Fibre
Microsoft Corporation
Norpac Foods**
PCC Structurals, Inc**
REC Solar Grade Silicon LLC
SP Newsprint**
Shell Oil Products US
Simpson Paper & Timber
Tesoro Refining and Marketing Co.
Wah Chang
West Linn Paper Company**
Weyerhaeuser

***Denotes PGE Customer*