

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 262

In The Matter Of
PORTLAND GENERAL ELECTRIC
COMPANY

PETITION TO INTERVENE OF
FRED MEYER STORES AND
QUALITY FOOD CENTERS,
DIVISIONS OF THE KROGER CO.

Request for a General Rate Revision

Fred Myer Stores and Quality Food Centers, Divisions of The Kroger Co. petitions to intervene in this proceeding. In support of this petition, the following is provided:

NAME OF PETITIONER: **Fred Meyer Stores and Quality Food Centers, Divisions Of The Kroger Co.**
ADDRESS: **Attn: Corporate Energy Manager, 1014 Vine Street, Cincinnati, Ohio 45202**
PHONE NUMBER: **513-762-4538** FAX NUMBER: **513-421-2764**
E-MAIL ADDRESS: dgeorge@kroger.com - Please do NOT include this contact on the service list.

NAME OF COUNSEL FOR PETITIONER: **Kurt J. Boehm, Esq. and Jody Kyler Cohn, Esq.**
BOEHM, KURTZ & LOWRY
COUNSEL'S ADDRESS: **36 East Seventh Street., Suite 1510, Cincinnati, OH 45202**
COUNSEL'S PHONE NUMBER: **513-421-2255**
COUNSEL'S FAX NUMBER: **513-421-2764**
COUNSEL'S E-MAIL ADDRESS: kboehm@BKLawfirm.com , jkylercohn@BKLawfirm.com

NAME OF CONSULTANT FOR PETITIONER: **Kevin C. Higgins – Energy Strategies Inc.**
CONSULTANT'S ADDRESS: **215 South State Street, Suite 200, Salt Lake City, UT 84111**
CONSULTANT'S PHONE NUMBER: **801-355-4365**
CONSULTANT'S FAX NUMBER: **801-521-9142**
CONSULTANT'S E-MAIL ADDRESS: khiggins@energystat.com

IF THE PETITIONER IS AN ORGANIZATION, THE NUMBER OF MEMBERS IN AND THE PURPOSES OF THE ORGANIZATION:

The Petitioner is seeking intervention on its own behalf as a customer of Portland General Electric Company. Petitioner is not seeking intervention in this matter as a member of a trade group or other organization.

NATURE AND EXTENT OF THE PETITIONER'S INTEREST IN THE PROCEEDING:

Petitioner operates approximately 36 grocery and discount department stores in the service territory of Portland General Electric Company. The total load of Petitioner is approximately 32 MW. The rate increase requested by the Applicant, if approved, would may in a significant rate increase for Petitioner. Petitioner has a substantial and diverse interest in the outcome of this case that cannot be adequately represented by any other party.

THE ISSUES THE PETITIONER INTENDS TO RAISE AT THE PROCEEDING:

The primary issue Fred Meyer intends to address in this case will be whether the rate revisions sought by the Applicant is reasonable and cost justified. We also intend to address whether the proposed allocation of the rate increase and the design of the new rates are just and reasonable.

ANY SPECIAL KNOWLEDGE OR EXPERTISE OF THE PETITIONER THAT WOULD ASSIST THE COMMISSION IN RESOLVING THE ISSUES IN THE PROCEEDING:

The Kroger Co., the owner of Fred Meyer Stores and Quality Food Centers, operates in 31 states and has approximately 3500 locations nationwide. Petitioner's regulatory counsel has extensive experience in all facets of electricity law. We expect to retain expert witnesses as necessary. This broad familiarity with ratemaking policy gives Petitioner special expertise that will assist the Commission in deciding the issues in this proceeding.

Based on the information provided above in accordance with the Commission's rules of procedure, Fred Meyer Stores and Quality Food Centers, Division of The Kroger Co. requests to participate in this proceeding as an intervenor. Petitioner represents that it will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding. OAR 860-013-0300.



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Date

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