



Portland General Electric Company
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Douglas C. Tingey
Assistant General Counsel

September 15, 2009

Via Electronic Filing and U.S. Mail

Oregon Public Utility Commission
Attention: Filing Center
550 Capitol Street NE, #215
PO Box 2148
Salem OR 97308-2148

Re: UG 171 – Phase II

Attention Filing Center:

Enclosed for filing in the captioned docket are an original and one copy of:

- **PORTLAND GENERAL ELECTRIC COMPANY'S PETITION TO INTERVENE**

This being filed by electronic mail with the Filing Center.

An extra copy of the cover letter is enclosed. Please date stamp the extra copy and return to me in the envelope provided.

Thank you in advance for your assistance.

Sincerely,


DOUGLAS C. TINGEY
Assistant General Counsel

DCT:cbm
Enclosures

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

**DOCKET NO. UG 171 (1)
Phase II**

<p>In the Matter of</p> <p>Oregon Public Utility Staff Requesting the Commission Direct Avista Utilities to file Tariffs Establishing Automatic Adjustment Clauses under the Terms of SB 408.</p>	<p>PORTLAND GENERAL ELECTRIC COMPANY'S PETITION TO INTERVENE</p>
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Portland General Electric Company ("PGE" or the "Company") petitions to intervene in this proceeding pursuant to Oregon Administrative Rule (OAR) 860-012-0001. In support of this petition, PGE provides the following.

- a) The name and address of the Company is:

Portland General Electric Company
121 SW Salmon Street
Portland, Oregon 97204

- b) PGE waives paper service in this docket. The names and addresses of the persons to be included on the official service list in this proceeding are:

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Tonkon Torp LLP
Pioneer Tower
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Rates & Regulatory Affairs
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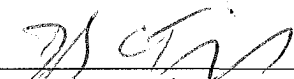
c) PGE is a public utility subject to the jurisdiction of the Commission. Decisions made and precedent established in this proceeding may directly affect PGE.

d) PGE is a party to Docket UE 178, which is a similar proceeding. As a result of recent events in this docket, including the request for legal briefs on two questions, and the decision of the Commission not to apply the temporary rule that is the subject of AR 537, it now appears that docket UG 171 includes issues which will impact all SB 408 tax-related companies including PGE. PGE requests that it be allowed to intervene to represent its interests. PGE has demonstrated good cause to intervene at this time because it was not originally apparent that Docket No. UG 171 would address the issues relevant to PGE.

e) PGE is aware of the schedule for briefing recently set in this docket and PGE is able to comply with that schedule. PGE's participation in this docket will not unreasonably broaden the issues, burden the record, or unreasonably delay this proceeding.

Accordingly, PGE's Petition to Intervene should be granted.

DATED this 15th day of September 2009.

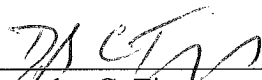


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CERTIFICATE OF SERVICE

I hereby certify that I have this day caused **PORTLAND GENERAL ELECTRIC COMPANY'S PETITION TO INTERVENE OUT OF TIME** to be served by electronic mail to those parties whose email addresses appear on the attached service list, and by First Class US Mail, postage prepaid and properly addressed, to those parties on the attached service list who have not waived paper service from OPUC Docket No. UG 171 - Phase II

Dated at Portland, Oregon, this 15th day of September, 2009.



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SERVICE LIST

UG 171 – Phase II

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