

1 **BEFORE THE OREGON PUBLIC UTILITIES COMMISSION**

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3 **UE 177, UE 178, UG 170 & UG 171**

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5 **In the Matters of OREGON PUBLIC**
6 **UTILITY COMMISSION STAFF**
7 **directing:**

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9 **PACIFIC POWER & LIGHT, dba**
10 **PACIFICORP, (UE 177)**

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12 **PORTLAND GENERAL ELECTRIC**
13 **COMPANY, (UE 178)**

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15 **NORTHWEST NATURAL, (UG 170)**

16
17 **and**

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19 **AVISTA UTILITIES (UG 171)**

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21 **To file tariffs establishing automatic**
22 **adjustment clauses under the terms**
23 **of SB 408.**

PETITIONS FOR INTERVENTION
OF:

KEN LEWIS and
UTILITY REFORM PROJECT

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27 Pursuant to OAR 860-13-021, KEN LEWIS and the UTILITY REFORM
28 PROJECT (URP) each petition to intervene in this docket as a party. In support of
29 this petition, each alleges as follows.

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31 Ken Lewis is ratepayer of Portland General Electric Company (PGE), Pacific
32 Power & Light Company (PP&L), and Northwest Natural Gas Co. (NWNG) at
33 multiple locations in Oregon.

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2 The Utility Reform Project (URP) is a ratepayer advocacy group formed in
3 1984, which has participated in dozens of OPUC proceedings and resulting court
4 dockets. URP which has among its members current and former ratepayers of
5 PGE, PP&L, and NWNNG.

6 4.

7 Petitioners are represented by attorneys Linda K. Williams and Daniel W.
8 Meek. Both are experienced in practice before the Commission, having appeared
9 in dozens of proceedings before it, and each is a member in good standing of the
10 Oregon State Bar.

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19 Attorney for Utility Reform Project

Attorney for Ken Lewis

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21 5.

22 Identification of specific issues petitioners intend to raise will depend upon the
23 scope, timing, and procedural rules of the proceeding, and the positions advocated
24 by the utilities and staff. In general, petitioners will seek to ensure that the
25 proceeding and its outcome comply with all applicable laws.
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Petitioners intend to participate as parties, to file testimony, conduct appropriate discovery, brief legal issues germane to their interests as well as others similarly situated. They will seek to coordinate their filings, potential witnesses, discovery and other matters with other parties in an effort to efficiently use resources and to not burden the proceeding.

WHEREFORE, Ken Lewis and Utility Reform Project request that the Commission:

- (1) Grant them intervenor status in the current proceeding;
- (2) Add to the service list of this proceeding its counsel and Ken Lewis.

Dated: December 26, 2005

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify I FILED the foregoing PETITION FOR INTERVENTION OF: KAFOURY BROTHERS, KAFOURY, LEWIS, NEWELL AND URP by e-mail upon the OPUC, followed by mail of the original and 5 copies this date to the Oregon Public Utility Commission, and further I certify that I served a copy as noted, by email and by placing a true copy of the foregoing placed in a sealed envelope and deposited in the U.S. Postal Service at Portland, Oregon, with first class postage prepaid, to:

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Dated: December 27, 2005

Daniel W. Meek