BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1208

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In the Matter of

PACIFICORP

Draft 2009 Request for Proposals pursuant to) Order No. 91-1383. PETITION TO INTERVENE OF THE INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

Pursuant to ORS § 756.525 and OAR § 860-012-0001, the Industrial Customers

of Northwest Utilities ("ICNU") petitions the Public Utility Commission of Oregon ("OPUC" or

the "Commission") to intervene in this proceeding with full party status as described in

OAR § 860-011-0035(5). 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 addresses:

Melinda J. Davison Matthew W. Perkins Davison Van Cleve, P.C. 333 S.W. Taylor, Suite 400 Portland, OR 97204 E-Mail: mail@dvclaw.com Telephone: (503) 241-7242 Randall J. Falkenberg RFI Consulting, Inc. 8343 Roswell Road PMB 362 Sandy Springs, GA 30350-2812 E-Mail: consultrfi@aol.com Telephone: (770) 379-0505

PAGE 1 – PETITION TO INTERVENE OF ICNU

DAVISON VAN CLEVE, P.C. 333 S.W. Taylor, Suite 400 Portland, OR 97204 Telephone: (503) 241-7242 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 PacifiCorp, as shown on Attachment A.

4. ICNU has a substantial interest in PacifiCorp's Draft 2009 Request for Proposals ("RFP") pursuant to Order No. 91-1383. PacifiCorp submitted an RFP for up to four base load plants on the East side of its system in 2012, 2013, and 2014. As large industrial ratepayers, ICNU's members have a strong interest in PacifiCorp's power plant portfolio.

5. 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. ICNU participated in UM 1182, the docket that established the competitive bidding guidelines to be used in 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 Telephone: (503) 241-7242 WHEREFORE, ICNU respectfully requests that the Commission grant its petition

to intervene with full party status in this proceeding.

Dated this 1st day of August, 2006.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

<u>/s/ Melinda J. Davison</u> Melinda J. Davison Matthew W. Perkins 333 S.W. Taylor, Suite 400 Portland, Oregon 97204 (503) 241-7242 phone (503) 241-8160 facsimile mail@dvclaw.com Of Attorneys for Industrial Customers of Northwest Utilities

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ATTACHMENT A INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

Air Liquide Air Products BPB Gypsum, Inc. Blue Heron Paper Company Boeing *Boise Cascade CNC Containers, Northwest Chemi-Con Materials Corporation Dyno Nobel, Inc. *ConAgra Foods Eka Chemicals, Inc. *Evanite Fiber *Georgia-Pacific Grays Harbor Paper, L.P. *Hewlett-Packard Inland Empire Paper Co. Intel *J.R. Simplot Kimberly-Clark Corporation Longview Fibre Microsoft Corporation *Norpac Foods Noveon Kalama, Inc. **Oregon Steel Mills** PCC Structurals, Inc. Ponderay Newsprint Co Shell Oil Products US Simpson Paper Simpson Timber Solar Grade Silicon LLC **SP** Newsprint Tesoro Refining and Marketing Co. *Wah Chang West Linn Paper Company *Weyerhaeuser

*Denotes PacifiCorp Customers



Attorneys at Law

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August 1, 2006

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 PACIFICORP Draft 2009 Request for Proposals pursuant to Order No. 91-1383 Docket No. UM 1208

Dear Filing Center:

Enclosed please find the original and two copies of the Petition to Intervene on behalf of the Industrial Customers of Northwest Utilities ("ICNU") in the above-referenced docket.

Please return one file-stamped copy of each document in the self-addressed, stamped envelope provided. Thank you for your assistance.

Sincerely,

/s/ Christian Griffen Christian W. Griffen

Enclosures Service List cc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing Petition to

Intervene of the Industrial Customers of Northwest Utilities upon the parties on the service list

via Electronic Mail and U.S. Mail, postage-prepaid.

Dated at Portland, Oregon, this 1st day of August, 2006.

<u>/s/ Christian Griffen</u> Christian W. Griffen

SUSAN K ACKERMAN PO BOX 10207 PORTLAND OR 97296-0207 susan.k.ackerman@comcast.net

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