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April 10, 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

> In the Matter of PACIFICORP, dba PACIFIC POWER & LIGHT COMPANY Re:

Request for Authorization of Deferral of Expense Changes Associated with

Utility Tax Liability. Docket No. UM 1240

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

cc: Service List

#### 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,
by causing the same to be deposited via Electronic Mail and in the U.S. Mail, postage-prepaid.

/s/ Christian Griffen Christian W. Griffen

Dated at Portland, Oregon, this 10th day of April, 2006.

CITIZENS' UTILITY BOARD OF OREGON JASON EISDORFER 610 SW BROADWAY - STE 308 PORTLAND OR 97205 jason@oregoncub.org

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#### BEFORE THE PUBLIC UTILITY COMMISSION

#### **OF OREGON**

#### **UM 1240**

In the Matter of	)
PACIFICORP	) PETITION TO INTERVENE OF THE INDUSTRIAL CUSTOMERS OF
Request for Authorization of Deferral of	) NORTHWEST UTILITIES
Expense Changes Associated with Utility Tax	)
Liability.	)
	)
	)

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 at the following address:

> 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

PAGE 1 – PETITION TO INTERVENE OF ICNU

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 Application for Deferred

Accounting of Expenses Associated with Utility Tax Liability ("Application"). PacifiCorp filed

its Application on January 6, 2006. PacifiCorp proposes to defer for later ratemaking treatment

the difference between the amount of income taxes calculated for setting rates and the tax

liability resulting from PacifiCorp's actual gross revenue, to the extent that this amount is not

already included in other adjustments. The deferral mechanism and account proposed in this

Docket could directly affect the rates that PacifiCorp provides to ICNU's members. As large

industrial ratepayers who pay substantial amounts in charges for income tax expenses included in

electric rates, ICNU's members have a strong interest in PacifiCorp's deferral of income tax

liability.

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.

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.

PAGE 2 – PETITION TO INTERVENE OF ICNU

DAVISON VAN CLEVE, P.C. 333 S.W. Taylor, Suite 400 Portland, OR 97204

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

Dated this 7th day of April, 2006.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Melinda J. Davison

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Of Attorneys for Industrial Customers
of Northwest Utilities

## 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

<sup>\*</sup>Denotes PacifiCorp Customers