

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1258

In the Matter of)	
)	
PACIFICORP, dba PACIFIC POWER & LIGHT COMPANY)	PETITION TO INTERVENE OF THE INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES
)	
Application for Deferred Accounting re MEHC Oregon Commitments 8 and 12.)	
_____)	

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 Irion Sanger Davison Van Cleve, P.C. 333 S.W. Taylor, Suite 400 Portland, OR 97204 E-Mail: mail@dvclaw.com Telephone: 503-241-7242 Facsimile: 503-241-8160	James T. Selecky Brubaker & Associates 1215 Fern Ridge Pkwy Suite 208 St. Louis, MO 63141 E-Mail: jtselecky@consultbai.com Telephone: (314) 275-7007 Facsimile: (314) 275-7036
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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 in Attachment A.

4. ICNU has a substantial interest in PacifiCorp's Application for Deferred Accounting regarding MEHC Oregon Commitments 8 and 12 ("Application"), which was filed on March 31, 2006. On April 18, 2006, PacifiCorp filed an amended Application in this docket. PacifiCorp proposes to defer the merger credits associated with conditions 8 and 12 of the Stipulation adopted by the Commission in the proceeding that allowed MidAmerican Energy Holdings Company to acquire PacifiCorp (Docket No. UM 1209). The deferral account proposed in this Docket may affect the rates that PacifiCorp provides to ICNU's members.

5. ICNU represents the interests of a number of large electric customers in the State of Oregon. ICNU participated in UM 1209 and is a party to the Stipulation that established the merger credits at issue in this proceeding. 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.

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

Dated this 8th day of May, 2006.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Melinda J. Davison

Melinda J. Davison

Irion Sanger

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

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 Structural, Inc.
Ponderay Newsprint Co
Shell Oil Products US
Simpson Paper
Simpson Timber
Solar Grade Silicon LLC
SP Newsprint Co.
Tesoro Refining and Marketing Co.
*Wah Chang
West Linn Paper Company
*Weyerhaeuser

*Denotes PacifiCorp Customers

Davison Van Cleve PC

Attorneys at Law

TEL (503) 241-7242 • FAX (503) 241-8160 • mail@dvclaw.com
Suite 400
333 S.W. Taylor
Portland, OR 97204

May 8, 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, dba PACIFIC POWER & LIGHT COMPANY
Application for Deferred Accounting re MEHC Oregon Commitments 8 and 12
Docket No. UM 1258

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 in the above-referenced docket.

Please return one file-stamped copy of the 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.

Dated at Portland, Oregon, this 8th day of May, 2006.

/s/ Christian Griffen
Christian W. Griffen

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

PACIFICORP
LAURA BEANE
MANAGER, REGULATION
825 MULTNOMAH STE 800
PORTLAND OR 97232-2153
laura.beane@pacificorp.com

MCDOWELL & ASSOCIATES PC
KATHERINE A MCDOWELL
520 SW SIXTH AVENUE, SUITE 830
PORTLAND OR 97204
katherine@mcd-law.com