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June 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 an Accounting Order Regarding Costs Related to the MidAmerican Energy Holdings Company Transition Docket No. UM 1263

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 proceeding.

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

Sincerely yours,

/s/ Anna E. Studenny Anna E. Studenny

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, shown below, on

the official service list by causing the foregoing document to be deposited, postage-prepaid, in

the U.S. Mail, and/or by service via electronic mail to those parties who waived paper service.

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

<u>/s/ Anna E. Studenny</u> Anna E. Studenny

MCDOWELL & ASSOCIATES PC KATHERINE A MCDOWELL ATTORNEY 520 SW SIXTH AVENUE, SUITE 830 PORTLAND OR 97204 katherine@mcd-law.com PACIFICORP DBA PACIFIC POWER & LIGHT ANDREA L KELLY VICE PRESIDENT – REGULATION 825 NE MULTNOMAH ST STE 2000 PORTLAND OR 97232 andrea.kelly@pacificorp.com

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1263

In the Matter of)	
PACIFICORP, dba PACIFIC POWER & LIGHT COMPANY)))	PETITION TO INTERVENE OF INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES
Application for an Accounting Order)	
Regarding Costs Related to the MidAmerican)	
Energy Holdings Company Transition.)	

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 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

THE

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 in Attachment A.

4. ICNU has a substantial interest in PacifiCorp's Application for an Accounting Order Regarding Costs Related to the MidAmerican Energy Holdings Company ("MEHC") Transition. ("Application"), which was filed on May 19, 2006. PacifiCorp seeks an accounting order authorizing capitalization of the costs of the transition from ScottishPower to MEHC ownership and amortization of the balance over a three-year period. The treatment of the transaction costs and benefits 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 supported the transaction on which this proceeding is grounded. 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.

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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 8th day of June, 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 Co. Tesoro Refining and Marketing Co. *Wah Chang West Linn Paper Company *Weyerhaeuser

*Denotes PacifiCorp Customers