

# Davison Van Cleve PC

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Suite 400  
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February 16, 2007

*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

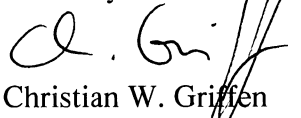
Re: In the Matter of PUBLIC UTILITY COMMISSION OF OREGON Investigation  
into the Treatment of CO2 Risk in the Integrated Resource Planning (IRP)  
Process.  
**Docket No. UM 1302**

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 matter.

Please return one file-stamped copy in the postage-prepaid envelope provided.  
Thank you for your assistance.

Sincerely,

  
Christian W. Griffen


Enclosures

cc: Service List

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have this day served the foregoing Petition to Intervene on behalf of the Industrial Customers of Northwest Utilities upon the parties on the service list, by causing the same to be deposited in the U.S. Mail, postage-prepaid.

Dated at Portland, Oregon, this 16th day of February, 2007.



Christian W. Griffen

**DEPARTMENT OF JUSTICE**  
JANET L PREWITT  
1162 COURT ST NE  
SALEM OR 97301-4096  
janet.prewitt@doj.state.or.us

**OREGON DEPARTMENT OF ENERGY**  
PHILIP H CARVER  
625 MARION ST NE STE 1  
SALEM OR 97301-3742  
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**OREGON PUBLIC UTILITY COMMISSION**  
MAURY GALBRAITH  
PO BOX 2148  
SALEM OR 97308-2148  
maury.galbraith@state.or.us

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1302**

In the Matter of the	)	
	)	
PUBLIC UTILITY COMMISSION OF	)	PETITION TO INTERVENE OF THE
OREGON	)	INDUSTRIAL CUSTOMERS OF
	)	NORTHWEST UTILITIES
Investigation into the Treatment of CO2	)	
Risk in the Integrated Resource Planning	)	
(IRP) Process.	)	

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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  
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

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.

4. ICNU has a substantial interest in this investigation into the treatment of CO2 risk in the integrated resource planning process. Any Commission decision in this docket could unnecessarily increase the costs of resources that are included in the rates that utilities provide to ICNU's members.

5. ICNU represents the interests of a number of large electric customers in the State of Oregon. ICNU has participated in UM 1056 and other IRP proceedings and workshops. 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 16th day of February, 2007.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

A handwritten signature in black ink, appearing to read "Irion Sanger", written over a horizontal line.

Melinda J. Davison

Irion Sanger

333 S.W. Taylor, Suite 400

Portland, Oregon 97204

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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 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