

Davison Van Cleve PC

Attorneys at Law

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

September 5, 2007

Via Electronic and US 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 Fuel Diversity and Fossil Fuel Generation
Docket No. UM 1331

Dear Filing Center:

Enclosed please find an original and one copy of the Petition to Intervene on behalf of the Industrial Customers of Northwest Utilities in the above-referenced docket.

Thank you for your assistance.

Sincerely yours,

/s/ Ruth A. Miller
Ruth A. Miller

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 in the U.S. Mail, postage-prepaid, and/or via electronic mail to those parties who waived paper service in this proceeding.

Dated at Portland, Oregon, this 5th day of September, 2007.

/s/ Ruth A. Miller
Ruth A. Miller

<p>LOWREY R BROWN JASON EISDORFER ROBERT JENKS CITIZENS' UTILITY BOARD OF OREGON 610 SW BROADWAY, SUITE 308 PORTLAND OR 97205 lowrey@oregoncub.org jason@oregoncub.org bob@oregoncub.org</p>	(W)	<p>RIC GALE SANDRA D HOLMES BARTON L KLINE MONICA B MOEN LISA D NORDSTROM MICHAEL YOUNGBLOOD IDAHO POWER COMPANY PO BOX 70 BOISE ID 83707-0070 rgale@idahopower.com sholmes@idahopower.com bkline@idahopower.com mmoen@idahopower.com inordstrom@idahopower.com myoungblood@idahopower.com</p>	(W)
<p>STEPHANIE S ANDRUS JANET PREWITT DEPARTMENT OF JUSTICE 1162 COURT ST NE SALEM OR 97301-4096 stephanie.andrus@state.or.us</p>	(W)	<p>KIMBERLY PERRY LISA F RACKNER MCDOWELL & RACKNER PC 520 SW SIXTH AVE SUITE 830 PORTLAND OR 97204 kim@mcd-law.com lisa@mcd-law.com</p>	(W)
<p>ROBIN STRAUGHAN OREGON DEPARTMENT OF ENERGY 625 MARION STREET NE SALEM OR 97301-3742 robin.straughan@state.or.us</p>	(W)	<p>MICHELLE R MISHOE PACIFIC POWER & LIGHT PACIFICORP OREGON DOCKETS 825 NE MULTNOMAH ST SUITE 2000 PORTLAND OR 97232 michelle.mishoe@pacificorp.com oregondockets@pacificorp.com</p>	
<p>BONNIE TATOM PUBLIC UTILITY COMMISSION OF OREGON PO BOX 2148 SALEM OR 97308-2148 Bonnie.tatom@state.or.us</p>		<p>J RICHARD GEORGE PORTLAND GENERAL ELECTRIC RATES & REGULATORY AFFAIRS 121 SW SALMON ST 1WTC1301 PORTLAND OR 97204 richard.george@pgn.com pge.opuc.filings@pgn.com</p>	

(W) = Waive Paper Service

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1331

In the Matter of)	
)	
PUBLIC UTILITY COMMISSION OF)	PETITION TO INTERVENE OF THE
OREGON)	INDUSTRIAL CUSTOMERS OF
)	NORTHWEST UTILITIES
Investigation into Fuel Diversity and Fossil)	
Fuel Generation.)	
_____)	

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
Allen C. Chan
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. Many of ICNU's members are customers of PacifiCorp and Portland General Electric Company ("PGE"), two investor-owned utilities that may be affected by any policies adopted in this proceeding.

4. ICNU has a substantial interest in the Commission's adoption of any standards for fuel diversity and fossil fuel generation. Any Commission decision in this docket may directly impact the rates that ICNU's members pay for electric service.

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.

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

Dated this 5th day of September, 2007.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Allen Chan

Melinda J. Davison

Allen C. Chan

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
Amcor PET Packaging USA, Inc.
BPB Gypsum
Blue Heron Paper Company
Boeing
Boise Cascade
Dyno Nobel, Inc.
ConAgra Foods
Eka Chemicals, Inc.
Emerald Kalama Chemical, LLC
Evanite Fiber
Georgia-Pacific
Grays Harbor Paper, L.P.
Hewlett-Packard
Hynix Semiconductor Manufacturing America
Inland Empire Paper Co.
Intel
J.R. Simplot
Kimberly-Clark Corporation
Longview Fibre
Microsoft Corporation
Norpac Foods
Oregon Steel Mills
PCC Structural, Inc.
SP Newsprint
Shell Oil Products US
Simpson Paper
Simpson Timber
Solar Grade Silicon LLC
Tesoro Refining and Marketing Co.
Wah Chang
West Linn Paper Company
Weyerhaeuser