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September 16, 2008

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 PACIFIC POWER & LIGHT Application of PacifiCorp for an
Accounting Order Approving Deferral of Costs Relating to Renewable Resources
Pursuant to Senate Bill 838
Docket No. UM 1338

Dear Filing Center:

Enclosed please find an original and one courtesy copy of the Petition to
Intervene on behalf of the Industrial Customers of Northwest Utilities in the above-referenced
docket. Thank you for your attention to this matter.

Sincerely yours,

/s/ Brendan E. Levenick
Brendan E. Levenick

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 September, 2008.

/s/ Brendan E. Levenick
Brendan E. Levenick

PACIFIC POWER AND LIGHT JOELLE STEWARD REGULATORY MANAGER 825 NE MULTNOMAH STE 2000 PORTLAND OR 97232 joelle.steward@pacificorp.com	PACIFICORP RYAN FLYNN LEGAL COUNSEL 825 NE MULTNOMAH, SUITE 1800 PORTLAND OR 97232 ryan.flynn@pacificorp.com
CITIZENS' UTILITY BOARD OF OREGON ROBERT JENKS 610 SW BROADWAY, SUITE 308 PORTLAND OR 97205 bob@oregoncub.org	

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1338

In the Matter of)
)
PACIFIC POWER & LIGHT) PETITION TO INTERVENE OF THE
(dba PACIFICORP)) INDUSTRIAL CUSTOMERS OF
) NORTHWEST UTILITIES
)
Application of PacifiCorp for an Accounting)
Order Approving Deferral of Costs Relating to)
Renewable Resources Pursuant to Senate Bill)
838)
_____)

Pursuant to ORS § 756.525 and OAR § 860-012-0001, the Industrial Customers of Northwest Utilities (“ICNU”) hereby petitions the Oregon Public Utility Commission (“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:

Irion A. Sanger
Davison Van Cleve, P.C.
333 S.W. Taylor, Ste. 400
Portland, OR 97204
E-Mail: ias@dvclaw.com
Telephone: (503) 241-7242
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8343 Roswell Road
PMB 362
Sandy Springs, GA 30350
E-Mail: consultrfi@aol.com
Telephone: (770) 379-0505
Facsimile: (770) 671-1046

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 members of ICNU are customers of PacifiCorp, as indicated on Attachment A.

4. ICNU has a substantial interest in the impacts of PacifiCorp's application for an accounting order approving deferral of costs. The proposed deferral could substantially and directly affect those of ICNU's members who purchase power from PacifiCorp. ICNU requests leave to intervene in this Docket to represent its members who are affected by the proposed rate deferral.

5. ICNU represents the interests of many of PacifiCorp's largest customers. ICNU has participated in prior SB 838 proceedings, including UM 1330, UE 200, and AR 518, as well as all of PacifiCorp's general rate cases since Docket No. UE 94. ICNU's intervention in this proceeding will assist the Commission in resolving the issues in this proceeding and will not unreasonably broaden the issues, burden the record, or unreasonably 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 September, 2008.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Irion A. Sanger

Irion Sanger

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Of Attorneys for the Industrial Customers of
Northwest Utilities

ATTACHMENT A
INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

Air Liquide
Air Products
Amcor PET Packaging USA, Inc. (CNC Containers Northwest)
Certain Teed Gypsum & Ceiling Manufacturing, Inc. (BPB)
Blue Heron Paper Company
Boeing
*Boise Paper
*ConAgra Foods
Dyno Nobel, Inc.
Eka Chemicals, Inc.
Emerald Performance Materials, LLC
Equa-Chlor, LLC
*Evanite Fiber
Evraz Oregon Steel Mills
*Georgia-Pacific
Grays Harbor Paper, L.P.
*Hewlett-Packard
Inland Empire Paper Company
Intel
*International Paper
J.R. Simplot
Kimberly-Clark Corporation
Linde, Inc.
Longview Fibre
Microsoft Corporation
*Norpac Foods
PCC Structurals, Inc.
Ponderay Newsprint
REC Solar Grade Silicon LLC
Shell Oil Products US
Simpson Paper & Timber
SP Newsprint
Tesoro Refining and Marketing Company
*Wah Chang
West Linn Paper Company
*Weyerhaeuser

*Denotes PacifiCorp Customers