

September 27, 2007

VIA ELECTRONIC FILING AND OVERNIGHT MAIL

Oregon Public Utility Commission 550 Capitol Street NE, Suite 215 Salem, OR 97310-2551

Attention:

Vikie Bailey-Goggins

andrea L. Kelly / PD

Administrator, Regulatory Operations

RE: **Docket UM 1340** - In the Matter of Portland General Electric Company Report on the Feasibility of Using Stochastic Modeling in the Annual Update

PacifiCorp, d.b.a. Pacific Power, hereby submits for filing an original and one copy of its Petition to Intervene and Waiver of Paper Service in the above-referenced matter.

Informal questions on this matter may be directed to Joelle Steward, Regulatory Manager, at (503) 813-5542.

Very truly yours,

Andrea L. Kelly

Vice President, Regulation

Enclosures

Cc: UM 1340 Service List

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

UM 1340

)	
In the Matter of)	
PORTLAND GENERAL)	
ELECTRIC COMPANY Report)	Petition to Intervene of Pacific Power and
On the Feasibility of Using)	Waiver of Paper Service
Stochastic Modeling in the)	-
Annual Update)	
)	

Pursuant to ORS 756.525 and OAR 860-012-0001, PacifiCorp, d.b.a. Pacific Power ("Pacific Power"), respectfully petitions to intervene in this proceeding and respectfully waives paper service in this docket. In support of this petition, Pacific Power states:

- 1. Pacific Power is an electric public utility in the state of Oregon and is subject to the jurisdiction of the Public Utility Commission of Oregon ("Commission").
- 2. The name and address of Pacific Power are:

PacifiCorp 825 NE Multnomah Street Portland, OR 97232

Communications concerning this proceeding should be addressed to:

Pacific Power Oregon Dockets 825 NE Multnomah Street, Ste 2000 Portland, OR 97232 OregonDockets@pacificorp.com

Michelle Mishoe Legal Counsel Pacific Power 825 NE Multnomah Street, Ste 1800 Portland, OR 97232

Phone: (503) 813-5977 Facsimile: (503) 813-7252

michelle.mishoe@pacificorp.com

3. Portland General Electric Company ("PGE") filed a report on the feasibility of

using stochastic modeling in the Annual Update pursuant to Order No. 07-015 in Docket

No. UE 180. The Commission initiated the instant docket to investigate the findings in

the report.

4. Pacific Power intends to file its stochastic modeling report fifteen business days

after a final order is entered in Docket No. UE 191. Because of this, Pacific Power has a

direct and substantial interest in this proceeding. Any Commission decision on the issues

could affect Pacific Power's business and future net power cost filings.

Pacific Power's participation may assist the Commission in resolving the issues 5.

before it. Pacific Power will not unreasonably broaden the issues, burden the record, or

unreasonably delay the proceedings. No other party can adequately represent Pacific

Power's interests in this proceeding.

WHEREFORE, Pacific Power respectfully requests that the Commission grant

this petition to intervene.

DATED: September 27, 2007.

Respectfully submitted,

Michelle R. Mishoe OSB# 07

Michelle R. Mishoe/AD

Pacific Power

Counsel for Pacific Power

CERTIFICATE OF SERVICE

I certify that I have cause to be served the foregoing **PETITION TO INTERVENE OF PACIFIC POWER** in OPUC Docket No. UM 1340 by electronic mail and first class mail to the parties on the attached service list.

DATED this 27th day of September, 2007.

W= waiver of paper service

Lowrey R. Brown (W)
Utility Analyst
Citizens' Utility Board of Oregon
610 SW Broadway, Ste 308
Portland, OR 97205
lowrey@oregoncub.org

Robert Jenks (W)
Citizens' Utility Board of Oregon
610 SW Broadway, Ste 308
Portland, OR 97205
bob@oregoncub.org

Douglas C. Tingey
Portland General Electric Company
121 SW Salmon Street 1WTC13
Portland, OR 97204
doug.tingey@pgn.com

Jason Eisdorfer (W)
Energy Program Director
Citizens' Utility Board of Oregon
610 SW Broadway, Ste 308
Portland, OR 97205
jason@oregoncub.org

Patrick G. Hager Manager, Regulatory Affairs Portland General Electric Company 121 SW Salmon Street 1WTC0702 Portland, OR 97204 patrick.hager@pgn.com

Deborah DePetris

Supervisor, Regulatory Administration