

# Davison Van Cleve PC

Attorneys at Law

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

January 14, 2008

*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 PORTLAND GENERAL ELECTRIC COMPANY Report on the  
Feasibility of Using Stochastic Modeling in the Annual Update  
**Docket No. UM 1340**

Dear Filing Center:

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

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, shown below, by causing the same to be sent by electronic mail to all parties, as well as, deposited in the U.S. Mail, postage-prepaid, to parties which have not waived paper service.

Dated at Portland, Oregon, this 14th day of January, 2008.

/s/ Ruth A. Miller  
Ruth A. Miller

**CITIZENS' UTILITY BOARD OF OREGON (W)**  
LOWREY R BROWN  
JASON EISDORFER  
ROBERT JENKS  
610 SW BROADWAY STE 308  
PORTLAND OR 97205  
lowrey@oregoncub.org  
jason@oregoncub.org  
bob@oregoncub.org

**PACIFIC POWER & LIGHT (W)**  
MICHELLE R MISHOE  
825 NE MULTNOMAH STE 1800  
PORTLAND OR 97232  
michelle.mishoe@pacificcorp.com  
oregondockets@pacificcorp.com

**PACIFICORP OREGON DOCKETS (W)**  
OREGON DOCKETS  
825 NE MULTNOMAH STE 1800  
PORTLAND OR 97232  
oregondockets@pacificcorp.com

**PORTLAND GENERAL ELECTRIC**  
DOUGLAS C TINGEY  
PATRICK HAGER  
RATES & REGULATORY AFFAIRS  
121 SW SALMON ST 1WTC0702  
PORTLAND OR 97204  
doug.tingey@pgn.com  
pge.opuc.filings@pgn.com

**(W) = Waive Paper Service**

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1340**

In the Matter of	)	
	)	PETITION TO INTERVENE OF THE
PORTLAND GENERAL ELECTRIC	)	INDUSTRIAL CUSTOMERS OF
COMPANY	)	NORTHWEST UTILITIES
	)	
Report on the Feasibility of Using Stochastic	)	
Modeling in the Annual Update	)	

Pursuant to ORS § 756.525 and OAR § 860-012-0001, the Industrial Customers of Northwest Utilities (“ICNU”) petitions the Oregon Public Utility Commission (“OPUC” or the “Commission”) to intervene in this proceeding with full party status as described in OAR § 860-011-0035(7). 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:

S. Bradley Van Cleve	Randall J. Falkenberg
Allen C. Chan	RFI Consulting, Inc.
Davison Van Cleve, P.C.	8351 Roswell Road, PMB 362
333 S.W. Taylor, Suite 400	Atlanta, GA 30350
Portland, OR 97204	E-Mail: <a href="mailto:consultrfi@aol.com">consultrfi@aol.com</a>
E-Mail: <a href="mailto:acc@dvclaw.com">acc@dvclaw.com</a>	Telephone: (770) 379-0505
Telephone: (503) 241-7242	Facsimile: (770) 671-1046
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 members of ICNU are customers of Portland General Electric Company (“PGE” or the “Company”), as indicated on Attachment A.

4. ICNU has a substantial interest in the outcome of this proceeding. ICNU represents the interests of many of PGE’s largest customers that may be affected by the Commission’s investigation into the findings in PGE’s report on the merits of stochastic modeling for net variable power costs. The Commission’s decision in this proceeding could have a substantial impact on the rates for service that PGE provides to ICNU’s members.

5. ICNU has participated in many proceedings before the Commission involving PGE. ICNU’s intervention in this proceeding will assist the Commission in resolving the issues, and will not unreasonably burden the record, delay the proceedings, or broaden the issues.

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. It is in the public interest to allow ICNU to intervene in this proceeding.

WHEREFORE, ICNU respectfully requests that the Commission grant this  
Petition to Intervene ordering full party status for ICNU in this proceeding.

Dated this 14th day of January, 2008.

Sincerely yours,

DAVISON VAN CLEVE, P.C.

/s/ Allen C. Chan

S. Bradley Van Cleve

Allen C. Chan

333 S.W. Taylor, Suite 400

Portland, OR 97204

(503) 241-7242 telephone

(503) 241-8160 facsimile

acc@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.  
Certain Teed Gypsum & Ceiling Manufacturing, Inc.  
\*Blue Heron Paper Company  
\*Boeing  
\*Boise Cascade  
ConAgra Foods  
Dyno Nobel, Inc.  
Eka Chemicals, Inc.  
Emerald Kalama Chemical, LLC  
Evanite Fiber  
\*Evraz Oregon Steel Mills  
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  
\*PCC Structurals, Inc.  
REC Silicon  
Shell Oil Products US  
Simpson Paper & Timber  
\*SP Newsprint  
Tesoro Refining and Marketing Co.  
Wah Chang  
\*West Linn Paper Company  
\*Weyerhaeuser

*\*Denotes PGE Customer*