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March 18, 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

Request for Approval of a 2008R-1 Solicitation Process for New Re: **Renewable Resources** Docket No. UM 1368

Dear Filing Center:

Enclosed please find the original and one (1) 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/ 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, shown

below, on the official service list by causing the foregoing document to be deposited, postage-

prepaid, in the U.S. Mail, or by service via electronic mail to those parties who have waived

paper service.

Dated at Portland, Oregon, this 18th day of March, 2008.

/s/ Brendan E. Levenick Brendan E. Levenick

OREGON PUBLIC UTILITY COMM'N

LISA C SCHWARTZ SENIOR ANALYSTPO BOX 2148 SALEM OR 97308-2148 lisa.c.schwartz@state.or.us

LOWREY R BROWN JASON EISDORFER ROBERT JENKS 610 SW BROADWAY STE 308 PORTLAND OR 97205 lowrey@oregoncub.org jason@oregoncub.org bob@oregoncub.org

CITIZENS' UTILITY BOARD OF OREGON (W)

PACIFICORP

NATALIE HOCKEN OREGON DOCKETS 825 NE MULTNOMAH SUITE 2000 PORTLAND OR 97232 natalie.hocken@pacificorp.com

W = Waived Paper Service

DEPARTMENT OF JUSTICE MICHAEL T WEIRICH ASSISTANT ATTORNEY 1162 COURT ST NE SALEM OR 97301-4096

SALEM OR 97301-4096 michael.weirich@doj.state.or.us

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1368

In the Matter of)
PACIFICORP, dba PACIFIC POWER)
Request for Approval of a 2008R-1 Solicitation Process for New Renewable Resources)))

PETITION TO INTERVENE OF THE INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

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 and

consultant at the following addresses:

Melinda J. Davison Irion Sanger Davison Van Cleve, P.C. 333 S.W. Taylor, Suite 400 Portland, OR 97204 E-Mail: ias@dvclaw.com Telephone: (503) 241-7242 Facsimile: (503) 241-8160

Randall J. Falkenberg RFI Consulting, Inc. 8343 Roswell Road PMB 362 Sandy Springs, GA 30350 E-Mail: consultrfi@aol.com Telephone: (770) 379-0505 Facsimile: (770) 671-1046

PAGE 1 – PETITION TO INTERVENE OF ICNU

DAVISON VAN CLEVE, P.C. 333 S.W. Taylor, Suite 400 Portland, OR 97204 Telephone: (503) 241-7242 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, as shown on Attachment A.

ICNU has a substantial interest in PacifiCorp's Request for Approval of a
2008R-1 Solicitation Process for New Renewable Resources. PacifiCorp filed its Application on
March 4, 2008.

5. ICNU has extensive experience with PacifiCorp's rates and resource solicitation process. 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.

7. ICNU waives paper service of documents in this proceeding.

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DAVISON VAN CLEVE, P.C. 333 S.W. Taylor, Suite 400 Portland, OR 97204 Telephone: (503) 241-7242 WHEREFORE, ICNU respectfully requests that the Commission grant its petition

to intervene with full party status in this proceeding.

Dated this 18th day of March, 2008.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

<u>/s/ Irion Sanger</u> Irion Sanger 333 S.W. Taylor, Suite 400 Portland, Oregon 97204 (503) 241-7242 phone (503) 241-8160 facsimile ias@dvclaw.com Of Attorneys for Industrial Customers of Northwest Utilities

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DAVISON VAN CLEVE, P.C. 333 S.W. Taylor, Suite 400 Portland, OR 97204 Telephone: (503) 241-7242

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 *ConAgra Foods Dyno Nobel, Inc. Eka Chemicals, Inc. Emerald Kalama Chemical, LLC *Evanite Fiber *Georgia-Pacific Grays Harbor Paper, L.P. *Hewlett-Packard Inland Empire Paper Company Intel *J.R. Simplot Kimberly-Clark Corporation Longview Fibre Microsoft Corporation *Norpac Foods **Oregon Steel Mills** PCC Structurals, Inc. Ponderay Newsprint Company SP Newsprint Shell Oil Products US Simpson Paper Simpson Timber Solar Grade Silicon, LLC Tesoro Refining and Marketing Company *Wah Chang West Linn Paper Company *Weyerhaeuser

*Denotes PacifiCorp Customers