

McDowell & Rackner PC



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June 13, 2007

VIA ELECTRONIC FILING

PUC Filing Center
Public Utility Commission of Oregon
PO Box 2148
Salem, OR 97308-2148

Re: Docket No. UM 989

Enclosed for filing is PacifiCorp's Petition to Intervene in the above-referenced docket. A copy of this filing has been served on all parties to this proceeding as indicated on the attached certificate of service.

Very truly yours,

A handwritten signature in black ink, appearing to read 'K.A. McDowell', written over a horizontal line.

Katherine A. McDowell

Enclosures

cc: Service List

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BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UM 989

In the Matter of
PORTLAND GENERAL ELECTRIC
COMPANY'S Application for an Accounting
Order and for Order Approving Tariff Sheets
Implementing Rate Reduction.

**PACIFICORP'S PETITION TO INTERVENE
(Waiver of Paper Service)**

Pursuant to ORS 756.525 and OAR 860-012-0001, PacifiCorp respectfully petitions to intervene in this proceeding and waives paper service in this docket. In support of this petition, PacifiCorp states:

1.

PacifiCorp is an electric public utility in the state of Oregon and is subject to the jurisdiction of the Public Utility Commission of Oregon (the "Commission").

2.

The name and address of PacifiCorp are:

PacifiCorp
825 NE Multnomah Street
Portland, OR 97232

Communications concerning this proceeding should be addressed to:

PacifiCorp Oregon Dockets
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Portland, OR 97232
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3.

This case and two others relating to rate recovery for PGE's Trojan nuclear plant, DR 10 and UE 88, are now pending before the Commission in joint remand proceedings. PacifiCorp is a party to DR 10, but not the other two cases.

4.

On April 19, 2007, the Commission issued Order No. 07-157 in the combined cases DR 10/UE 88/UM 989. In that order, the Commission held the first phase of the proceedings in abeyance and immediately commenced the second phase to investigate the Commission's delegated authority to engage in retroactive ratemaking. Given "the generality and breadth of the issue," the Commission recognized that other parties would want to participate in the case. Accordingly, the Commission directed that the schedule accommodate the intervention of additional parties.

5.

PacifiCorp has a direct and substantial interest in this proceeding, given the fundamental ratemaking principles implicated. While PacifiCorp could potentially continue to participate as a party to DR 10 only, it is moving to intervene in this case and UE 88 to ensure its ability to fully participate in the proceedings.

6.

PacifiCorp's participation may assist the Commission in resolving the issues before it. PacifiCorp will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceedings. No other party can adequately represent PacifiCorp's interests in this proceeding.

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1 WHEREFORE, PacifiCorp respectfully requests that the Commission grant this
2 petition to intervene.

3 DATED: June 13, 2007.

4 McDOWELL & RACKNER PC

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6 _____
7 Katherine A. McDowell

8 Attorneys for PacifiCorp
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CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing document in Docket UM 989 on the following named person(s) on the date indicated below by email and first-class mail addressed to said person(s) at his or her last-known address(es) indicated below.

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DATED: June 13, 2007.

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Sarah J. Adams

Of Attorneys for PacifiCorp