Davison Van Cleve PC

Attorneys at Law

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May 2, 2006

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

> > Application for approval of asset purchase and development agreement in

Sherman County, Oregon. Docket No. UP 234

Dear Filing Center:

Enclosed please find the original and two copies of the Petition to Intervene on behalf of the Industrial Customers of Northwest Utilities ("ICNU") in the above-referenced docket.

Please return one file-stamped copy of each document in the self-addressed, stamped envelope provided. Thank you for your assistance.

Sincerely,

/s/ Anna E. Studenny Anna E. Studenny

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, by causing the same to be deposited via Electronic Mail and in the U.S. Mail, postage-prepaid.

Dated at Portland, Oregon, this 2nd day of May 2, 2006.

/s/ Anna E. Studenny Anna E. Studenny

PORTLAND GENERAL ELECTRIC J. RICHARD GEORGE 121 SW SALMON 1WTC1301 PORTLAND OR 97204 doug.tingey@pgn.com PORTLAND GENERAL ELECTRIC RATES & REGULATORY AFFAIRS 121 SW SALMON ST 1WTC0702 PORTLAND OR 97204 pge.opuc.filings@pgn.com

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

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| In the Matter of the |) | |
|---|---|--|
| PORTLAND GENERAL ELECTRIC |) | PETITION TO INTERVENE OF THE INDUSTRIAL CUSTOMERS OF |
| Application for approval of asset purchase and development agreement in Sherman |) | NORTHWEST UTILITIES |
| County, Oregon. |) | |
| |) | |

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 at the following address:

S. Bradley Van Cleve Matthew W. Perkins Sarah C. Yasutake Davison Van Cleve, P.C. 333 S.W. Taylor, Suite 400 Portland, OR 97204 E-Mail: mail@dvclaw.com

Telephone: (503) 241-7242 Facsimile: (503) 241-8160

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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 Portland General

Electric Company ("PGE"), as shown in Attachment A.

4. ICNU has a substantial interest in PGE's Application for the approval of

asset purchase and development agreement in Sherman County, Oregon, which was filed on

April 14, 2006. The transaction proposed in this Docket may directly affect the rates that PGE

provides to ICNU's members.

5. ICNU represents the interests of a number of large electric customers in

the State of Oregon. 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.

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DAVISON VAN CLEVE, P.C. 333 S.W. Taylor, Suite 400 Portland, OR 97204

WHEREFORE, ICNU respectfully requests that the Commission grant its petition to intervene with full party status in this proceeding.

Dated this 2nd day of May, 2006.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

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Of Attorneys for Industrial Customers
of Northwest Utilities

ATTACHMENT A INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

Air Liquide

Air Products

BPB Gypsum, Inc.

*Blue Heron Paper Company

*Boeing

*Boise Cascade

CNC Containers, Northwest

Chemi-Con Materials Corporation

Dyno Nobel, Inc.

ConAgra Foods

Eka Chemicals, Inc.

Evanite Fiber

Georgia-Pacific

Grays Harbor Paper, L.P.

Hewlett-Packard

Inland Empire Paper Co.

*Intel

J.R. Simplot

Kimberly-Clark Corporation

Longview Fibre

Microsoft Corporation

*Norpac Foods

Noveon Kalama, Inc.

*Oregon Steel Mills

*PCC Structurals, Inc.

Ponderay Newsprint Co

Shell Oil Products US

Simpson Paper

Simpson Timber

Solar Grade Silicon LLC

*SP Newsprint Co.

Tesoro Refining and Marketing Co.

Wah Chang

*West Linn Paper Company

*Weyerhaeuser

^{*} Denotes PGE Customers