Davison Van Cleve PC

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December 13, 2007

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

> In the Matter of PORTLAND GENERAL ELECTRIC COMPANY Re:

Application for Approval to Transfer Property associated with the Bull

Run project to Western Rivers Conservancy.

Docket No. UP 237

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/ Eric Shelton Eric G. Shelton

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 13th day of December, 2007.

/s/ Eric Shelton
Eric G. Shelton

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

PORTLAND GENERAL ELECTRIC

PATRICK HAGER RATES & REGULATORY AFFAIRS 121 SW SALMON ST 1WTC0702 PORTLAND OR 97204 pge.opuc.filings@pgn.com

W = Waived Paper Service

DEPARTMENT OF JUSTICE

STEPHANIE S ANDRUS REGULATED UTILITY & BUSINESS SECTION 1162 COURT ST NE SALEM OR 97301-4096 stephanie.andrus@state.or.us

PORTLAND GENERAL ELECTRIC COMPANY

J RICHARD GEORGE 121 SW SALMON ST 1WTC1301 PORTLAND OR 97204 richard.george@pgn.com

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UP 237

In the Matter of)
PORTLAND GENERAL ELECTRIC) PETITION TO INTERVENE OF THE) INDUSTRIAL CUSTOMERS OF
COMPANY) NORTHWEST UTILITIES
)
Application for Approval to Transfer)
Property associated with the Bull Run)
project to Western Rivers Conservancy.)

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:

Melinda J. Davison
Andrew N. Harris
Brubaker & Associates, Inc.
Davison Van Cleve, P.C.
17244 W. Cordova Ct.
Surprise, AZ 85387

Portland, OR 97204 E-mail: kiverson@consultbai.com

E-Mail: mail@dvclaw.com Telephone: (623) 975-7279 Telephone: (503) 241-7242 Facsimile: (314) 275-7036

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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 transfer

of property associated with the Bull Run project to Western Rivers Conservancy. 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 made in connection with the Application. 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 Telephone: (503) 241-7242

WHEREFORE, ICNU respectfully requests that the Commission grant this

Petition to Intervene ordering full party status for ICNU in this proceeding.

Dated this 13th day of December 2007.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Andrew Harris

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Portland, OR 97204
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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

*Weyerhaeuse

^{*}Denotes PGE Customer