

**BEFORE THE PUBLIC UTILITY COMMISSION**

**OF OREGON**

**LC 43**

In the Matter of )  
 )  
PORTLAND GENERAL ELECTRIC ) PETITION TO INTERVENE OF THE  
COMPANY ) INDUSTRIAL CUSTOMERS OF  
 ) NORTHWEST UTILITIES  
 )  
2007 Integrated Resource Plan )

Pursuant to ORS § 756.525 and OAR § 860-012-0001, the Industrial Customers of Northwest Utilities (“ICNU”) hereby petitions the Oregon Public Utility Commission (“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 attorney and consultant at the following addresses:

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PMB 362  
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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 members of ICNU are customers of Portland General Electric Company (“PGE”), as indicated on Attachment A.

4. ICNU has a substantial interest in the impacts of PGE’s Integrated Resource Plan (“IRP”) because disposition of this issue could affect the rates that ICNU’s members pay for its service from PGE. ICNU requests leave to intervene in this Docket to represent its members who would be affected by the proposed IRP.

5. ICNU represents the interests of many of PGE’s largest customers. ICNU participated in PGE’s most recent general rate cases as well as numerous other proceedings that affected PGE’s rates. ICNU’s intervention in this proceeding will assist the Commission in resolving the issues in this proceeding and will not unreasonably broaden the issues, burden the record, or unreasonably 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.

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

Dated this 8th day of August, 2007.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ S. Bradley Van Cleve

S. Bradley Van Cleve

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Of Attorneys for the Industrial Customers of  
Northwest Utilities

**ATTACHMENT A**  
**INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES**

Air Liquide  
Air Products  
Amcors PET Packaging USA, Inc.  
BPB Gypsum, Inc.  
\*Blue Heron Paper Company  
\*Boeing  
\*Boise Cascade  
Chemi-Con Materials Corporation  
Dyno Nobel, Inc.  
ConAgra Foods  
Eka Chemicals, Inc.  
Emerald Kalama Chemical, LLC  
Evanite Fiber  
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  
\*Oregon Steel Mills  
\*PCC Structural, Inc.  
Ponderay Newsprint Co  
Shell Oil Products US  
Simpson Paper  
Simpson Timber  
Solar Grade Silicon LLC  
\*SP Newsprint  
Tesoro Refining and Marketing Co.  
Wah Chang  
\*West Linn Paper Company  
\*Weyerhaeuser

\*Denotes PGE Customers

# Davison Van Cleve PC

Attorneys at Law

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August 8, 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

Re: In the Matter of PORTLAND GENERAL ELECTRIC COMPANY  
2007 Integrated Resource Plan  
**Docket No. LC 43**

Dear Filing Center:

Enclosed please find the Petition to Intervene of the Industrial Customers of Northwest Utilities ("ICNU") in the above-captioned docket.

Please note that ICNU hereby waives paper service in this proceeding. Please reflect this fact on the official service list.

Thank you for your assistance.

Sincerely yours,

/s/ Irion Sanger  
Irion Sanger

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 official service list by causing the same to be served via electronic and USPS mail.

Dated at Portland, Oregon, this 8th day of August, 2007.

/s/ Christian Griffen  
Christian W. Griffen

### **CITIZENS' UTILITY BOARD OF OREGON**

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### **DEPARTMENT OF JUSTICE**

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