

# ESLER, STEPHENS & BUCKLEY

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November 30, 2009

Via Electronic and First Class Mail

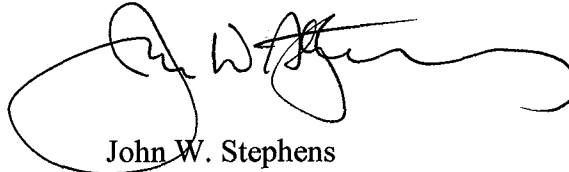
Filing Center  
Public Utility Commission  
P.O. Box 2148  
Salem, Oregon 97308-2148

Re: In the Matter of Portland General Electric Company, 2009 Integrated Resource  
Plan PUC Docket No. LC 48

Dear Filing Center:

Enclosed please find an original and one copy of Petition to Intervene of Renewable  
Northwest Project.

Yours truly,

A handwritten signature in black ink, appearing to read "John W. Stephens", with a large, sweeping flourish at the end.

John W. Stephens

JWS/mec  
cc: Service List  
Enclosures

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BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

LC 48

**In the Matter of** )  
 )  
**PORTLAND GENERAL ELECTRIC** ) **PETITION TO INTERVENE OF**  
**COMPANY** ) **RENEWABLE NORTHWEST PROJECT**  
 )  
 )  
**2009 Integrated Resource Plan** )

Pursuant to OAR 860-012-0001, Renewable Northwest Project petitions to intervene as a  
“party” in this proceeding.

1. The name and address of the petitioner is:

Renewable Northwest Project  
917 S.W. Oak, Suite 303  
Portland, Oregon 97205  
[ann@rnp.org](mailto:ann@rnp.org)

2. The name and address of the attorney representing the petitioner is:

John W. Stephens, Esq.  
Esler, Stephens & Buckley  
888 S.W. Fifth, Suite 700  
Portland, Oregon 97204-2021  
[stephens@eslerstephens.com](mailto:stephens@eslerstephens.com); [mec@eslerstephens.com](mailto:mec@eslerstephens.com)

3. Petitioner requests that service of documents also be made on:

Ann Gravatt  
Renewable Northwest Project  
917 S.W. Oak, Suite 303  
Portland, Oregon 97205  
[ann@rnp.org](mailto:ann@rnp.org)

Ken Dragoon  
Renewable Northwest Project  
917 S.W. Oak, Suite 303  
Portland, Oregon 97205  
[ken@rnp.org](mailto:ken@rnp.org)

4. Petitioner is an advocacy organization whose members include environmental and consumer groups, and businesses who are involved in the development and manufacture of renewable energy projects and products. The purpose of the group is to promote the implementation of environmentally sound, workable renewables in the Northwest.

5. Petitioner and its counsel have appeared in numerous utility Integrated Resource Plan dockets. In addition, Petitioner's counsel has been actively involved in many general rate cases. Petitioner and its counsel believe that as a consequence of this experience, they have knowledge and expertise that may assist the Commission in resolving the issues in the proceeding.

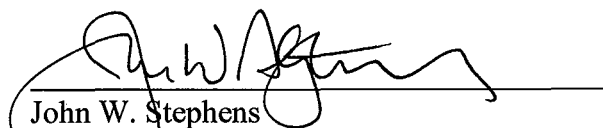
6. Petitioner has sufficient interest in the proceeding, and petitioner's appearance and participation will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding.

7. Petitioner waives paper service of documents.

DATED this 30 day of November, 2009.

ESLER, STEPHENS & BUCKLEY

By:

  
John W. Stephens  
Of Attorneys for Renewable Northwest  
Project

## CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing **PETITION TO INTERVENE** on the following persons on November 30, 2009, by hand-delivering, faxing, e-mailing, or mailing (as indicated below) to each a copy thereof, and if mailed, contained in a sealed envelope, with postage paid, addressed to said attorneys at the last known address of each shown below and deposited in the post office on said day at Portland, Oregon:

Gordon Feighner  
[gordon@oregoncub.org](mailto:gordon@oregoncub.org)  
Citizen's Utility Board of Oregon  
610 S.W. Broadway, Suite 308  
Portland, Oregon 97205

- by hand-delivery
- by facsimile
- by first class mail
- by e-mail

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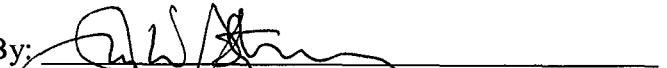
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Portland, Oregon 97232

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- by e-mail

DATED this 30<sup>th</sup> day of November, 2009.

ESLER STEPHENS & BUCKLEY

By:

  
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[stephens@eslerstephens.com](mailto:stephens@eslerstephens.com)  
Of Attorneys for Renewable Northwest Project