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December 8, 2005

Via electronic and US Mail

Filing Center
Administrative Hearings Division
Public Utility Commission of Oregon
PO Box 2148
Salem, OR 97308-2148

Re: In the Matter of OREGON PUBLIC UTILITY STAFF Requests the Commission direct PORTLAND GENERAL ELECTRIC to file tariffs establishing automatic adjustment clauses under the terms of SB 408.

Docket No. UE 178

Dear Filing Center:

Enclosed please find the original and one copy of the Industrial Customers of Northwest Utilities' Petition to Intervene in the above-referenced proceeding.

Please call me if you have any questions. Thank you for your assistance.

Sincerely,

/s/ Christian Griffen

Christian W. Griffen

Enclosures

cc: Service List

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 178

| | | |
|--|---|------------------------------|
| In the Matter of |) | |
| |) | |
| OREGON PUBLIC UTILITY |) | PETITION TO INTERVENE OF THE |
| COMMISSION STAFF Directing |) | INDUSTRIAL CUSTOMERS OF |
| |) | NORTHWEST UTILITIES |
| PORTLAND GENERAL ELECTRIC |) | |
| COMPANY |) | |
| |) | |
| to File Tariffs Establishing Automatic |) | |
| Adjustment Clause Under the Terms of |) | |
| SB 408. |) | |
| _____ |) | |

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:

Melinda J. Davison
Matthew W. Perkins
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

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 on Attachment A.

4. ICNU has a substantial interest in the establishment and implementation of an automatic adjustment clause by PGE under Senate Bill ("SB") 408. SB 408 seeks to ensure that amounts that Oregon utilities collect in rates for income taxes reflect the amounts that those utilities or the consolidated group of which the utility is a member actually pay to units of government. This proceeding will address the establishment and implementation of an automatic adjustment clause in accordance with section 3(4) of SB 408 in order to consider an adjustment to rates related to taxes actually paid by PGE or the affiliated group of which PGE is a member. As large industrial ratepayers who pay substantial amounts in charges for income tax expenses included in electric rates, ICNU's members have a strong interest in PGE's income tax adjustment clause.

5. 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.

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

Dated this 8th day of December, 2005.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Melinda J. Davison

Melinda J. Davison

Matthew W. Perkins

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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 Structural, Inc.
Ponderay Newsprint Co
Shell Oil Products US
Simpson Paper
Simpson Timber
Solar Grade Silicon LLC
Tesoro Refining and Marketing Co.
Wah Chang
*West Linn Paper Company
*Weyerhaeuser

**Denotes PGE Customers*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served a copy of the Industrial Customers of Northwest Utilities' Petition to Intervene upon the parties on the service list, shown below, by causing the same to be mailed, postage-prepaid, through the U.S. Mail.

Dated at Portland, Oregon, this 8th day of December, 2005.

/s/ Christian Griffen
Christian W. Griffen

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| LOWREY R BROWN CITIZENS' UTILITY BOARD OF OREGON 610 SW BROADWAY - STE 308 PORTLAND OR 97205 lowrey@oregoncub.org | JASON EISDORFER CITIZENS' UTILITY BOARD OF OREGON 610 SW BROADWAY STE 308 PORTLAND OR 97205 jason@oregoncub.org |
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