

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

UE 180/UE 181

In the Matter of )  
 )  
PORTLAND GENERAL ELECTRIC )  
COMPANY )  
 )  
Request for a General Rate Revision. )  
 (UE 180), )

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LEAGUE OF OREGON CITIES'  
PETITION TO INTERVENE

In the Matter of )  
 )  
PORTLAND GENERAL ELECTRIC )  
COMPANY )  
 )  
Annual Adjustments to Schedule 125 )  
(2007 RVM Filing). (UE 181). )

Pursuant to ORS § 756.525 and OAR 860-12-0001, the League of Oregon Cities (the "League") hereby petitions the Public Utility Commission of Oregon ("Commission") for leave to intervene and participate with full party status in the above-captioned consolidated proceedings. In support of this petition, the League provides the following information in the order set forth in OAR 860-12-0001(1)(a)-(f):

1. The name and address of the petitioner is:

League of Oregon Cities  
PO Box 928  
Salem, Oregon 97308  
Phone number: (503) 588-6550

2. The League's authorized representative for purposes of these proceedings is Andrea Fogue. The League's attorney for purposes of these proceedings is Jim Deason,

Attorney at Law. All communications regarding these proceedings should be provided to the League's authorized representative and attorney at the following addresses:

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3. Founded in 1925, the League is an intergovernmental entity whose membership is comprised of two hundred forty one (241) individually-incorporated municipalities located throughout Oregon. The League's membership includes 52 cities that receive electric service from Portland General Electric ("PGE"). Exhibit 1 to this Petition contains a listing of those 52 PGE-served cities and provides for their respective population estimates from the 2004 federal census.

4. The League serves its member cities by providing them a wide array of services. These services include research, education and training on topics relating to municipal business and governmental operations. The League also provides policy advocacy for its members before a wide array of administrative agencies and legislative bodies.

5. The League and the constituent cities it represents have substantial interests in the outcome of these proceedings. Among other things, PGE seeks approval of a number of changes to the tariffs pursuant to which the League and its members purchase power. The proposed revisions affect not only PGE's standard commercial and industrial cost-of-service and direct access tariffs, but also tariffs which are predominantly, if not exclusively, used only by cities (e.g., those governing the use of street lights). The League has for years assisted its members with their efforts to evaluate the impact of changes in regulated tariffs, and since the enactment

of SB1149 the League has also assisted cities with evaluating and the various risks and rewards that could result from choices made under PGE's direct access tariffs. Granting the League intervenor status in these proceedings will allow the League to continue to serve its members in these areas.

6. In addition to general rate impacts, these proceedings could impact other areas of particular interest to cities, such as franchise rights which typically the number one source of revenue allowing cities to provide essential services to citizens such as water, sewer, police and fire. The League has extensive experience in the workings of municipal business operations, the nature and scope of franchise fees and other topics that will assist the Commission in resolving issues in these proceedings. Moreover, the League is in the best position to bring to the Commission an understanding of how PGE's proposal may have a broad range of impacts on cities of varying populations, the scope of services a city provides and the nature of the role a particular municipal government wishes to play in its community. The League requests the opportunity to be heard and to address these and other issues related to this filing, as the need arises and such issues need resolution during the course of these proceedings.

7. The League's participation will be in the public interest and will not unreasonably broaden the issues, burden the record, or delay the proceeding. The League has participated in many proceedings before the Commission, including recent proceeding such as AR 394, AR 421, AR 498, AR 499, AR 506, UE 115, UE 116, UE 118, UE 119, UM 1121 and UM 1209.

WHEREFORE, the League respectfully requests that the Commission grant this petition to intervene.

DATED this 12<sup>th</sup> day of May, 2006.

**/s/ Jim Deason**

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Attorney for the League of Oregon Cities

LOC Exhibit 1

**CITIES SERVED BY PORTLAND GENERAL ELECTRIC**

<b>City:</b>	<b>Population (2004 Census):</b>	<b>City:</b>	<b>Population (2004 Census):</b>
Amity	1,480	Milwaukie	20,590
Aurora	660	Molalla	5,930
Banks	1,430	Mt. Angel	3,600
Barlow	140	Newberg	19,910
Beaverton	79,350	North Plains	1,650
Carlton	1,560	Oregon City	28,370
Cornelius	10,150	Portland	550,560
Dayton	2,230	Rivergrove	340
Damascus	9,670	St. Helens	11,370
Donald	660	St. Paul	400
Dundee	2,900	Salem	143,700
Durham	1,400	Sandy	6,350
Estacada	2,450	Scotts Mills	300
Fairview	9,250	Sheridan	5,620
Gaston	620	Sherwood	14,190
Gervais	2,130	Silverton	8,060
Gladstone	12,140	Tigard	44,650
Gresham	94,250	Troutdale	14,380
Happy Valley	6,640	Tualatin	24,940
Hillsboro	79,940	Turner	1,480
Hubbard	2,750	West Linn	23,970
Johnson City	630	Willamina	1,850
Keizer	34,380	Wilsonville	16,250
King City	2,100	Woodburn	21,590
Lafayette	3,060	Wood Village	2,870
Lake Oswego	35,930	Yamhill	820

## **CERTIFICATE OF SERVICE**

I hereby certify that I have this day caused the foregoing PETITION TO INTERVENE OF THE LEAGUE OF OREGON CITIES to be served upon each party listed below, by email, or, when not available, by mail, postage prepaid, and upon the Commission by email and by sending the original plus (1) copy by U.S. mail, postage prepaid, to the Commission's Salem offices.

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DATED this 12<sup>th</sup> day of May, 2006.

*/s/ Jim Deason*

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