

**BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON**

UE 180/UE 181

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

PORTLAND GENERAL ELECTRIC  
COMPANY  
2007 Resource Valuation Mechanism  
(UE 181).

PETITION TO INTERVENE OF  
CONSTELLATION NEWENERGY, INC.

Pursuant to ORS § 756.525 and OAR § 860-012-0001, Constellation NewEnergy, Inc. (“CNE”) respectfully petitions the Oregon Public Utility Commission (“Commission”) to intervene in the above-captioned, consolidated proceedings with full party status as described in OAR § 860-011-0035(5). In support of this petition, CNE represents as follows:

1. CNE’s business address is:

Greg Kosier  
Constellation NewEnergy, Inc.  
350 South Grand Avenue, Suite 3800  
Los Angeles, CA 90071

2. For purposes of CNE’s participation in these proceedings, all documents relating to these proceedings should be served on CNE’s representatives at the following addresses:

Bill Chen  
Director of Regulatory Affairs  
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3. CNE is a Commission-certified Scheduling Electricity Service Supplier (“ESS”) in the state of Oregon and has been serving large non-residential customers in the service territory of Portland General Electric (“PGE”) since January 1, 2005.
4. CNE is a leading national competitive energy supplier that serves commercial, industrial, and governmental customers, including more than two-thirds of the Fortune 100, representing more than 15,000 megawatts of peak electric load in sixteen states, Washington, D.C. and two Canadian provinces.
5. CNE is a wholly-owned subsidiary of Constellation Energy, a Fortune 205 company based in Baltimore, Maryland, with a market capitalization of \$8.8 billion and over 9,000 employees.
6. As the provider of electricity to PGE’s large non-residential customers through direct access, CNE has a unique and substantial interest in PGE’s application to revise its electricity rates. The proposed rate changes could substantially and directly affect CNE’s business in PGE’s service territory by impacting the future viability of direct access for CNE’s existing customers as well as for other eligible direct access customers in PGE’s service territory.
7. CNE’s intervention in this proceeding will assist the Commission in resolving the issues in these proceedings and will not unreasonably broaden the issues, burden the record, or unreasonably delay these proceedings.
8. As described above, CNE has a direct and substantial interest in these proceedings that cannot 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 CNE to intervene in this proceeding.

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

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

Respectfully submitted,

*/s/ Bill Chen*

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Bill Chen

Director of Regulatory Affairs

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## CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing PETITION TO INTERVENE OF CONSTELLATION NEWENERGY, INC. to:

Public Utility Commission of Oregon  
Attn: Filing Center  
P.O. Box 2148  
Salem, OR 97308-2148

on the 12<sup>th</sup> day of May, 2006, by electronic copy to the Case Manager, Judy Johnson, e-mail address: [judy.johnson@state.or.us](mailto:judy.johnson@state.or.us) and by sending via overnight FedEx delivery the original and two copies of said document at Walnut Creek, California on said day.

I further certify that I served a copy of the foregoing PETITION TO INTERVENE OF CONSTELLATION NEWENERGY, INC. on the individuals identified on the attached Service List by electronic mail on said day.

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

*/s/ Bill Chen* \_\_\_\_\_  
Bill Chen  
Director of Regulatory Affairs  
Constellation NewEnergy, Inc.

Summary Report

UE 180 PORTLAND GENERAL ELECTRIC

Category: Electric Rate Case

Filed By: PORTLAND GENERAL ELECTRIC

In the Matter of
PORTLAND GENERAL ELECTRIC COMPANY
Request for a General Rate Revision (Attachment 039-A to Work Papers [non-confidential Work Papers retained by Utility Staff] are Confidential and located in Envelope #319 in locked cabinet.).
Filed...

Filing Date: 3/15/2006 Advice No: 06-8
Effective Date: 4/14/2006 Expiration Date: 1/13/2007 Status: SUSPENDED

UE 184

Final Order: Signed: 3/15/2006

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**Summary Report**

**UE 180 PORTLAND GENERAL ELECTRIC**

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