



City of Gresham

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July 20, 2006

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

Re: In the Matter of Portland General Electric Company
Request for a General Rate Revision
OPUC Docket Nos. UE 180 / UE 181 / UE 184

Dear Filing Center:

Enclosed are three originals and three copies of the Petition of the City of Gresham to Intervene for filing in the above-referenced matters pending before the OPUC. The petition is also being filed electronically with the Filing Center.

Thank you.

Very truly yours,

David R. Ris
Senior Assistant City Attorney

Enclosures

c: Service List

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4 BEFORE THE PUBLIC UTILITY COMMISSION
5 OF OREGON

6 UE 180 / UE 181 / UE 184

7 In the Matters of) PETITION OF CITY OF GRESHAM
8 PORTLAND GENERAL ELECTRIC COMPANY) TO INTERVENE
9 Request for a General Rate Revision)
10 _____)

11 Pursuant to ORS 756.525 and OAR 860-012-0001, the City of Gresham (“Gresham”)
12 respectfully petitions the Commission for leave to intervene as a party in the Commission’s
13 review of Portland General Electric’s (“PGE”) rate filing on the following grounds:

14 1. The City of Gresham is a municipal corporation duly organized and existing
15 under the laws of the State of Oregon.

16 2. The name and address of the Petitioner is:

17 City of Gresham
18 1333 NW Eastman Pkwy.
19 Gresham, OR 97030
Telephone: (503) 618-3000

20 3. For purposes of its participation in this proceeding, correspondence and service
21 papers related to this proceeding should be sent to Gresham at the following address:

22 David R. Ris
23 Senior Assistant City Attorney
24 Gresham City Attorney’s Office
25 1333 NW Eastman Pkwy.
26 Gresham, OR 97030
Telephone: (503) 618-2507
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John Harris
Transportation Operations Superintendent
City of Gresham
1333 NW Eastman Pkwy.
Gresham, OR 97030
Telephone: (503) 618-2907
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1 3. Gresham has a substantial interest in PGE’s application to revise its rates. The
2 proposed rate changes would substantially and directly affect Gresham as a municipal
3 corporation and as a customer of PGE. This matter is of vital significance to Gresham.

4 (a) Gresham is one of PGE’s sizable customers. Gresham has approximately
5 115 utility accounts for city buildings, wastewater treatment, water supply, and parks for annual
6 billings of almost \$650,000. In addition, Gresham has annual billings for streetlight
7 maintenance and electricity of almost \$680,000, and another \$60,000 is budgeted to power
8 traffic signals. Gresham has an obligation to keep its electricity expenditures low, minimizing
9 costs for taxpayers.

10 (b) Gresham had intended to participate in these proceedings solely by
11 cooperating with Intervenors League of Oregon Cities and City of Portland. Upon further
12 review of the various filings, Gresham has determined that its interests in these proceedings are
13 largely unique from the other municipal intervenors. Gresham’s focus is on Schedule 91 relating
14 to streetlights and Schedule 92 relating to traffic signals and how the revised schedules will
15 impact Gresham’s provision of these basic and critical services. Gresham is also interested in
16 potential changes to Schedule 83 relating to large non-residential customers.

17 (c) Intervenor League of Oregon Cities is representing the broad interest of its
18 members, which does not reflect the specific interest of Gresham.

19 (d) Intervenor City of Portland has raised issues other than Schedules 91 and
20 92. Portland and Gresham have different mixes of Option B and C streetlights and therefore will
21 be impacted differently by the proposed Schedule 91. Gresham is a growing community, having
22 recently annexed 540 acres with approximately 2,500 acres in the urban services boundary that
23 will be annexed. Gresham estimates that these new areas will result in the number of streetlights
24 increasing by approximately 40% and traffic signals by approximately 25%, and proposed
25 Schedules 91 and 92 will impact the costs of development and operations of these newly
26 annexed areas.

1 4. Gresham will address such issues as it deems relevant to its interests in this
2 proceedings, including both issues that it identifies itself within the time set for such action and
3 issues identified by others that may affect Gresham's interests.

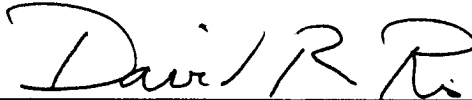
4 5. Gresham's appearance and participation will not unreasonably broaden the issues,
5 burden the record, or delay this proceeding. Gresham will accept the record in these consolidated
6 dockets as is, including any additions to the record by PGE or additions to the record based on
7 discovery by other Intervenor. Gresham reserves the right to conduct further discovery
8 regarding Gresham-specific information after consulting with PGE regarding the scope of
9 discovery.

10 6. Based on oral communications, PGE and Intervenor City of Portland, League of
11 Oregon Cities, Citizen's Utility Board, and Industrial Customers of Northwest Utilities do not
12 object to this Petition to Intervene.

13 WHEREFORE, the City of Gresham requests an order authorizing it to intervene as a
14 party in this proceeding.

15 DATED this 20th day of July, 2006.

16 CITY OF GRESHAM

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18 _____
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25 Of Attorneys for City of Gresham
26

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I served a true and correct copy of the foregoing PETITION OF
3 CITY OF GRESHAM TO INTERVENE on the following named person(s) on the date indicated
4 below by email, and first class mail (unless paper service has been waived) at his or her last
5 known address indicated below.

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8 121 SW Salmon Street 1WTC0702
9 Portland, OR 97204
10 pge.opuc.filings@pgn.com

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13 DATED this 20th day of July, 2006.

14 CITY OF GRESHAM

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16 By



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