

# Davison Van Cleve PC

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October 22, 2007

*Via Electronic Mail and U.S. Mail*

Public Utility Commission  
Attn: Filing Center  
550 Capitol St. NE #215  
P.O. Box 2148  
Salem OR 97308-2148

Re: In the Matter of PORTLAND GENERAL ELECTRIC COMPANY  
Application to Amortize the Boardman Deferral.  
**Docket No. UE 196**

Dear Filing Center:

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

Thank you for your assistance.

Sincerely,

/s/ Christian Griffen  
Christian W. Griffen

Enclosures

cc: Service List

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have this day served the foregoing Petition to Intervene of the Industrial Customers of Northwest Utilities upon the parties, on the official service list shown below for UE 196, via U.S. Mail and electronic mail.

Dated at Portland, Oregon, this 22nd day of October, 2007.

/s/ Christian Griffen  
Christian W. Griffen

**CITIZENS' UTILITY BOARD OF OREGON**

LOWREY R BROWN  
JASON EISDORFER  
ROBERT JENKS  
610 SW BROADWAY - STE 308  
PORTLAND OR 97205  
lowrey@oregoncub.org  
jason@oregoncub.org  
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**DEPARTMENT OF JUSTICE**

STEPHANIE S ANDRUS  
REGULATED UTILITY & BUSINESS SECTION  
1162 COURT ST NE  
SALEM OR 97301-4096  
stephanie.andrus@state.or.us

**PORTLAND GENERAL ELECTRIC**

DOUGLAS C TINGEY  
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**PORTLAND GENERAL ELECTRIC**

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**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UE 196**

In the Matter of )  
 )  
PORTLAND GENERAL ELECTRIC ) PETITION TO INTERVENE OF THE  
COMPANY ) INDUSTRIAL CUSTOMERS OF  
 ) NORTHWEST UTILITIES  
 )  
Application to Amortize the Boardman Deferral. )  
 )

Pursuant to ORS § 756.525 and OAR § 860-012-0001, the Industrial Customers of Northwest Utilities (“ICNU”) petitions the Oregon Public Utility Commission (“OPUC” or the “Commission”) to intervene in this proceeding with full party status as described in OAR § 860-011-0035(7). 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 and consultant at the following addresses:

Melinda J. Davison	Randall J. Falkenberg
Allen C. Chan	RFI Consulting, Inc.
Davison Van Cleve, P.C.	8351 Roswell Road, PMB 362
333 S.W. Taylor, Suite 400	Atlanta, GA 30350
Portland, OR 97204	E-Mail: <a href="mailto:consultrfi@aol.com">consultrfi@aol.com</a>
E-Mail: <a href="mailto:mail@dvclaw.com">mail@dvclaw.com</a>	Telephone: (770) 379-0505
Telephone: (503) 241-7242	Facsimile: (770) 671-1046
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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 members of ICNU are customers of Portland General Electric Company (“PGE” or the “Company”) as indicated on Attachment A.

4. ICNU has a substantial interest in the outcome of this proceeding. In Docket No. UM 1234, the Commission issued Order No. 07-049 allowing PGE to defer approximately \$26 million in costs associated with an outage at PGE’s Boardman plant in order to track and preserve these costs for later incorporation in rates through an amortization schedule. In this proceeding, PGE filed an application to establish the amortization schedule for these costs. Even though PGE proposes to offset the deferral amount with customer credits to avoid a rate impact from the amortization, the Commission’s decision in this proceeding could have a substantial impact on the rates for service that PGE provides to ICNU’s members.

5. ICNU represents the interests of many of PGE’s largest customers and has participated in many proceedings before the Commission involving PGE, including Docket No. UM 1234. ICNU’s intervention in this proceeding will assist the Commission in resolving the issues, and will not unreasonably burden the record, delay the proceedings, or broaden the issues.

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 the Application. It is in the public interest to allow ICNU to intervene in this proceeding.

WHEREFORE, ICNU respectfully requests that the Commission grant this  
Petition to Intervene ordering full party status for ICNU in this proceeding.

Dated this 22nd day of October, 2007.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Allen Chan

Melinda J. Davison

Allen C. Chan

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Of Attorneys for Industrial Customers of Northwest  
Utilities

**ATTACHMENT A**  
**INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES**

Air Liquide  
Air Products  
Ampcor PET Packaging USA, Inc.  
BPB North American Services  
\*Blue Heron Paper Company  
\*Boeing  
\*Boise Cascade  
ConAgra Foods  
Dyno Nobel, Inc.  
Eka Chemicals, Inc.  
Emerald Kalama Chemical, LLC  
Evanite Fiber  
Georgia-Pacific  
Grays Harbor Paper, L.P.  
Hewlett-Packard  
Hynix Semiconductor Manufacturing America  
Inland Empire Paper Co.  
\*Intel  
J.R. Simplot  
Kimberly-Clark Corporation  
Longview Fibre  
Microsoft Corporation  
\*Norpac Foods  
\*Oregon Steel Mills  
\*PCC Structural, Inc.  
Ponderay Newsprint Co.  
\*SP Newsprint  
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*