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BEFORE THE OREGON PUBLIC UTILITIES COMMISSION

UF 4218/UM 1206

In the Matter of

**OREGON ELECTRIC UTILITY
COMPANY, LLC, et al.**

**Application for Authorization to
Acquire Portland General Electric
Co.**

**PETITION FOR INTERVENTION
OF:**

UTILITY REFORM PROJECT

1.

Pursuant to OAR 860-13-021, the Utility Reform Project (URP) petitions to intervene in this docket.

2.

URP is a non-profit corporation duly incorporated under the laws of Oregon. Its mailing address is 10949 S.W. 4th Avenue, Portland, Oregon 97219. Among its principal purposes is to represent its members and utility ratepayers generally in proceedings before the Oregon Public Utility Commission (OPUC). The Project has more than 20 members, several of whom are PGE ratepayers.

3.

Petitioner is represented by:

Daniel W. Meek, Attorney
10949 S.W. 4th Avenue
Portland, OR 97219
(503) 293-9021 voice
(503) 293-9099 fax
dan@meek.net

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4.

Identification of the issues petitioner intends to raise at the hearing will require sufficient time to analyze the Application and information developed during the discovery process.

5.

URP has participated in dozens of OPUC proceedings.

6.

To the extent allowed by the formality of the proceeding, URP intends to:

- a. submit written testimony and exhibits;
- b. call witnesses;
- c. cross-examine witnesses called by others;
- d. file written arguments, briefs, memoranda and motions as directed by the hearings officer or required by the course of proceedings.

Dated: July 6, 2005

Respectfully Submitted,

DANIEL W. MEEK
OSB No. 79124
10949 S.W. 4th Avenue
Portland, OR 97219
503-293-9021 voice
503-293-9099 fax
dan@mEEK.net

Attorney for Utility Reform Project

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CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing PETITION FOR INTERVENTION OF:
UTILITY REFORM PROJECT by mailing a true and correct copy thereof, placed in a
sealed envelope and deposited in the U.S. Postal Service at Portland, Oregon, on July
6, 2005, with the postage prepaid, to the service list in this UM 1121 proceeding, as
displayed at 3:00 p.m. this day on the web site of the OPUC, as set forth below:

10 J Jeffrey Dudley
11 Portland General Electric
12 121 SW Salmon St 1wtc1301
13 Portland OR 97204

Stephanie Andrus
Department of Justice
1162 Court St NE
Salem OR 97301-4096

14 Michael Morgan
15 Tonkon Torp Llp
16 888 SW 5th Ave Ste 1600
17 Portland OR 97204-20992

PGE - OPUC Filings
Rates & Regulatory Affairs
Portland General Electric
121 Sw Salmon St 1wtc0702
Portland OR 97204

18 Mitchell Taylor
19 Enron Corporation
20 1221 Lamar, Suite 1600
21 Houston TX 77010

22
23 Dated: July 6, 2005
24
25

26 _____
27 Daniel W. Meek
28