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December 7, 2005

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 for Deferred Accounting of Excess Power Costs Due to Plant
Outage
Docket No. UM 1234

Dear Filing Center:

Enclosed please find an original and six copies of the Petition to Intervene on behalf of the Industrial Customers of Northwest Utilities in the above-referenced docket.

Please return one file-stamped copy of the document in the self-addressed, stamped envelope provided. Thank you for your assistance.

Sincerely,

Anna E. Studenny
Anna E. Studenny

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 UM 1209, via U.S. Mail and electronic mail.

Dated at Portland, Oregon, this 7th day of December, 2005.

Anna E. Studenny
Anna E. Studenny

RATES & REGULATORY AFFAIRS PORTLAND GENERAL ELECTRIC RATES & REGULATORY AFFAIRS 121 SW SALMON ST 1WTC0702 PORTLAND OR 97204 pge.opuc.filings@pgn.com	DOUGLAS C TINGEY PORTLAND GENERAL ELECTRIC 121 SW SALMON 1WTC13 PORTLAND OR 97204 doug.tingey@pgn.com
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**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1234

In the Matter of)	
)	
PORTLAND GENERAL ELECTRIC COMPANY,)	PETITION TO INTERVENE OF THE
)	INDUSTRIAL CUSTOMERS OF
Application for Deferred Accounting of Excess Power Costs Due to Plant Outage.)	NORTHWEST UTILITIES
)	

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 attorney at the following address:

Melinda J. Davison Davison Van Cleve, P.C. 333 S.W. Taylor, Suite 400 Portland, OR 97204 E-Mail: mail@dvclaw.com Telephone: 503-241-7242 Facsimile: 503-241-8160	Randall J. Falkenberg RFI Consulting, Inc. 8351 Roswell Road, PMB 362 Atlanta, GA 30350 E-Mail: consultrfi@aol.com Telephone: 770-379-0505 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. PGE seeks to defer 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 its Application, PGE asks the Commission to permit it to defer costs indefinitely, through the duration of the Boardman outage. PGE’s request is extremely open-ended and broad—the Company states that it does not know when the plant will be operational again. As a result, PGE’s request runs afoul of the requirement in ORS § 757.259(4) that deferrals may only be authorized for specific periods of time. Any Commission decision regarding the treatment of these costs 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. 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 7th day of December, 2005.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Melinda J. Davison

Melinda J. Davison

Sarah C. Yasutake

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Of Attorneys for Industrial Customers of Northwest
Utilities

ATTACHMENT A
INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

Air Liquide
Air Products
BPB Gypsum, Inc.
Blue Heron Paper Company*
Boeing*
Boise Cascade*
CNC Containers, Northwest
Chemi-Con Materials Corporation
Dyno Nobel, Inc.
ConAgra Foods
Eka Chemicals, Inc.
Evanite Fiber
Georgia-Pacific
Grays Harbor Paper, L.P.
Hewlett-Packard
Inland Empire Paper Co.
Intel*
J.R. Simplot
Kimberly-Clark Corporation
Longview Fibre
Microsoft Corporation
Norpac Foods*
Noveon Kalama, Inc.
Oregon Steel Mills*
PCC Structural, Inc.*
Ponderay Newsprint Co
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*