

1 **BEFORE THE OREGON PUBLIC UTILITIES COMMISSION**

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3 **UM 1238, UM 1240, UM 1266, UM 1271**

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5 **In the Matters of**

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7 **PORTLAND GENERAL ELECTRIC**
8 **COMPANY**

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10 **Deferred Accounting Authorization for**
11 **Expenses Associated with Utility Tax**
12 **Liability (UM 1238)**

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14 **PACIFICORP**

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16 **Deferred Accounting Authorization for**
17 **Expenses Associated with Utility Tax**
18 **Liability (UM 1240)**

19
20 **AVISTA CORPORATION**

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22 **Deferred Accounting Authorization for**
23 **Expenses Associated with Utility Tax**
24 **Liability (UM 1266)**

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26 **PORTLAND GENERAL ELECTRIC**
27 **COMPANY**

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29 **Deferred Accounting Authorization for**
30 **certain Expenses/Revenue Refunds**
31 **Associated with SB 408 and the Sale of**
32 **Certain Non-utility Assets (UM 1271)**

PETITIONS FOR
INTERVENTION OF:

UTILITY REFORM PROJECT,
KEN LEWIS, AND
NANCY NEWELL

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36 Pursuant to ORS 756.525 and OAR 860-13-021, the Utility Reform Project
37 (URP), Ken Lewis, and Nancy Newell petition to intervene in these dockets, which
38 are not consolidated.

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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 30 members, several of whom are ratepayers of Portland General Electric Co. (PGE), PacifiCorp, and/or Northwest Natural Gas Company (NWNG).

3.

Ken Lewis is ratepayer of PGE and PacifiCorp. He resides at:

2980 N.W. Monte Vista Terrace
Portland, OR 97210
503-222-7447 voice
503-222-2454 fax
KL05pdx@comcast.net

4.

Nancy Newell is a PacifiCorp ratepayer and has been for many years. She resides at:

3917 NE Skidmore Street
Portland, OR 97211
503-288-3986 voice

Nancy Newell has investigated, written, and spoken on issues involving energy, environmental protection, and corporate responsibility for almost 30 years.

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Petitioners URP and Nancy Newell are represented by:

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

Petitioner Ken Lewis is represented by:

Linda K. Williams
10266 S.W. Lancaster Road
Portland, OR 97219
503-293-0399 voice
503-245-2772 fax
linda@lindawilliams.net

6.

Petitioners intend to pursue in particular the issue of the federal, state, and/or local income taxes that utilities have charged to Oregon ratepayer but in fact have not paid to the federal, state, and/or local governments. Petitioners seek no alteration to the existing schedule of the proceeding.

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To the extent allowed by the formality of the proceeding, each petitioner intends to engage in some or all of the following actions:

- a. receive and consider all filings;
- b. offer public comment, when allowed;
- c. submit written testimony and exhibits;

- 1 d. call witnesses;
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3 e. cross-examine witnesses called by others;
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5 f. file written arguments, briefs, memoranda and motions as directed by the
6 hearings officer or required by the course of proceedings.
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10 URP has participated in dozens of OPUC proceedings and more than a dozen
11 suits against OPUC final orders. Ken Lewis and Nancy Newell have participated in
12 several OPUC proceedings involving utility rates and sales of utilities.

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14 Petitioners request the granting of their interventions in this docket and the
15 placing on the service list of Daniel Meek, Linda Williams, and Ken Lewis, at the
16 street addresses and email addresses provided above.
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18 Dated: December 19, 2006

Respectfully Submitted,

19 LINDA K. WILLIAMS
20 OSB No. 78425
21 10266 S.W. Lancaster Road
22 Portland, OR 97219
23 503-293-0399 voice
24 503-245-2772 fax
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27 Attorney for Ken Lewis
28

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Attorney for URP & Newell

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing PETITIONS FOR INTERVENTION OF: UTILITY REFORM PROJECT, KEN LEWIS, AND NANCY NEWELL by mailing a copy properly addressed with first class postage, and by electronic mail pursuant to OAR 860-013-0070 to every email address listed on the docket website this date, to the following parties or attorneys of parties:

LOWREY R BROWN CUB 610 SW BROADWAY - # 308 PORTLAND OR 97205	JASON EISDORFER (Q) CUB 610 SW BROADWAY - # 308 PORTLAND OR 97205	JUDY JOHNSON OREGON PUC P.O. BOX 2148 SALEM, OR 97308-2148
MELINDA DAVISON DAVISON VAN CLEVE PC 333 SW TAYLOR - # 400 PORTLAND OR 97204	JASON JONES DEPT JUSTICE 1162 COURT ST NE SALEM OR 97301-4096	INARA SCOTT PGE 121 SW SALMON 1WTC13 PORTLAND OR 97204
MATHHEW PERKINS DAVISON VAN CLEVE PC 333 SW TAYLOR - # 400 PORTLAND OR 97204	RATES & REG AFFAIRS PGE 121 SW SALMON 1WTC0702 PORTLAND OR 97204	KATHERINE A MCDOWELL ATTORNEY 520 SW SIXTH AVE # 830 PORTLAND OR 97204
LAURA BEANE MANAGER - REGULATORY 825 MULTNOMAH # 2000 PORTLAND OR 97232	DAVID J MEYER AVISTA CORP. PO BOX 3727 SPOKANE WA 99220-3727	KELLY NORWOOD AVISTA UTILITIES STATE & FEDERAL REG PO BOX 3727 SPOKANE WA 99220-3727
BOB JENKS CUB 610 SW BROADWAY - # 308 PORTLAND OR 97205		

Dated: December 19, 2006

Daniel W. Meek