# Davison Van Cleve PC

# Attorneys at Law

TEL (503) 241-7242 • FAX (503) 241-8160 • mail@dvclaw.com Suite 400 333 SW Taylor Portland, OR 97204

June 9, 2009

### Via Electronic and US Mail

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

> In the Matter of PACIFICORP, dba PACIFIC POWER Application to Re:

Open Docket and Appointment of an Independent Evaluator for a 2009

Request for Proposals for Supply-side Renewable Resources.

Docket No. UM 1429

Dear Filing Center:

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

Thank you for your assistance.

Sincerely,

/s/ Brendan E. Levenick Brendan E. Levenick

Enclosures

Service List cc:

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have this day served the foregoing Petition to

Intervene on behalf of the of the Industrial Customers of Northwest Utilities upon the parties, on
the service list, by causing the same to be deposited in the U.S. Mail, postage-prepaid, and via
electronic mail.

Dated at Portland, Oregon, this 9th day of June, 2009.

Sincerely,

/s/ Brendan E. Levenick Brendan E. Levenick

PACIFIC POWER & LIGHT JORDAN A WHITE 825 NE MULTNOMAH STE 1800 PORTLAND OR 97232 jordan.white@pacificorp.com	PACIFICORP OREGON DOCKETS OREGON DOCKETS 825 NE MULTNOMAH ST STE 2000 PORTLAND OR 97232 oregondockets@pacificorp.com
OPUC KELCEY BROWN PO BOX 2148 SALEM OR 97301 kelcey.brown@state.or.us	

#### BEFORE THE PUBLIC UTILITY COMMISSION

#### **OF OREGON**

#### **UM 1429**

In the Matter of	)
PACIFICORP, dba PACIFIC POWER	) PETITION TO INTERVENE OF THE INDUSTRIAL CUSTOMERS OF
Application to Open Docket and Appointment	,
of an Independent Evaluator for a 2009	)
Request for Proposals for Supply-side	)
Renewable Resources.	)
	)

Pursuant to ORS § 756.525 and OAR § 860-012-0001, the Industrial Customers of Northwest Utilities ("ICNU") petitions the Public Utility Commission of Oregon ("OPUC" or the "Commission") to intervene in this proceeding with full party status as described in OAR § 860-011-0035(5). 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 and consultant at the following addresses:

S. Bradley Van Cleve Randall J. Falkenberg
Irion A. Sanger RFI Consulting, Inc.
Davison Van Cleve, P.C. 8343 Roswell Road
333 S.W. Taylor, Suite 400 PMB 362
Portland, OR 97204 Sandy Springs, GA 30350
E-Mail: mail@dvclaw.com E-Mail: consultrfi@aol.com

ias@dvclaw.com Telephone: (770) 379-0505

Telephone: (503) 241-7242 Facsimile: (770) 671-1046 Facsimile: (503) 241-8160

PAGE 1 – PETITION TO INTERVENE OF ICNU

- 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 of ICNU's members are customers of PacifiCorp. A list of ICNU's members is included as Attachment A.
- 4. ICNU represents the interests of many of the largest customers of PacifiCorp. ICNU routinely participates in PacifiCorp cases filed with the OPUC, including PacifiCorp's most recent general rate case, UE 210, and PacifiCorp's recent request for proposals in Docket No. UM 1208. ICNU was also an active party in Docket No. UM 1182, which adopted the competitive bidding rules that govern this proceeding.
- 5. ICNU represents the interests of a number of large electric customers in the State of Oregon. ICNU's intervention in this proceeding will assist the Commission in resolving the issues in this proceeding and will not unreasonably broaden the issues, burden the record, or unreasonably delay this proceeding.
- 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 these proceedings. It is in the public interest to allow ICNU to intervene in this proceeding.

WHEREFORE, ICNU respectfully requests that the Commission grant its petition to intervene with full party status in this proceeding.

Dated this 9th day of June, 2009.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Irion A. Sanger
S. Bradley Van Cleve
Irion A. Sanger
333 S.W. Taylor, Suite 400
Portland, Oregon 97204
(503) 241-7242 phone
(503) 241-8160 facsimile
mail@dvclaw.com
Of Attorneys for Industrial Customers
of Northwest Utilities

# ATTACHMENT A INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

Air Liquide

Air Products

Amcor PET Packaging USA, Inc. (CNC Containers Northwest)

Certain Teed Gypsum & Ceiling Manufacturing, Inc. (BPB)

Blue Heron Paper Company

Boeing

\*Boise Cascade LLC

\*Boise Paper

\*ConAgra Foods

Dyno Nobel, Inc.

Eka Chemicals, Inc.

Emerald Performance Materials, LLC

Equa-Chlor, LLC

\*Evanite Fiber

Evraz Oregon Steel Mills

\*Freres Lumber Company

\*Georgia-Pacific

Grays Harbor Paper, L.P.

\*Hewlett-Packard

Inland Empire Paper Co.

Intel

\*International Paper

J.R. Simplot

Kimberly-Clark Corporation

Linde, Inc.

Longview Fibre

Microsoft Corporation

\*Norpac Foods

PCC Structurals, Inc.

Ponderay Newsprint

**REC Solar Grade Silicon LLC** 

Shell Oil Products US

Simpson Paper & Timber

**SP** Newsprint

Tesoro Refining and Marketing Co.

\*Wah Chang

West Linn Paper Company

\*Weyerhaeuser

<sup>\*</sup>Denotes PacifiCorp Customers