

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1442

In the Matter of)	
)	
PUBLIC UTILITY COMMISSION OF)	PETITION TO INTERVENE OF THE
OREGON)	INDUSTRIAL CUSTOMERS OF
)	NORTHWEST UTILITIES
)	
Investigation to determine if PACIFIC)	
POWER's rate revision has been consistent with)	
the methodologies and calculations required by)	
<u>Order No. 05-584</u>)	

Pursuant to ORS § 756.525 and OAR § 860-012-0001, the Industrial Customers of Northwest Utilities (“ICNU”) hereby petitions the Oregon Public Utility Commission (“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 attorneys at the following address:

Melinda J. Davison
Irion A. Sanger
Davison Van Cleve, P.C.
333 S.W. Taylor, Ste. 400
Portland, OR 97204
E-mail: mail@dvclaw.com
Telephone: (503) 241-7242

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 PacifiCorp, as indicated on Attachment A.

4. ICNU has a substantial interest in the Commission's investigation to determine if PacifiCorp's rate revision has been consistent with the methodologies and calculations required by Order No. 05-584. The proposed order could change and directly affect those of ICNU's members who purchase power from, or sell power as qualifying facilities to, PacifiCorp. ICNU requests leave to intervene in this Docket to represent its members who are affected by the proposed investigation.

5. ICNU represents the interests of many of PacifiCorp's largest customers. ICNU has participated in numerous other proceedings that affected PacifiCorp's rates, including its avoided cost rates. 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 September, 2009.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Irion A. Sanger

Melinda J. Davison

Irion A. Sanger

333 S.W. Taylor, Suite 400

Portland, Oregon 97204

(503) 241-7242 phone

mail@dvclaw.com

Of Attorneys for the Industrial Customers of
Northwest Utilities

ATTACHMENT A
INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

Air Liquide
Air Products
Amcor PET Packaging USA, Inc.
BPB North American Services
Blue Heron Paper Company
Boeing
*Boise Paper
*ConAgra Foods
Dyno Nobel, Inc.
Eka Chemicals, Inc.
Emerald Kalama Chemical, LLC
*Evanite Fiber
*Georgia-Pacific
Grays Harbor Paper, L.P.
*Hewlett-Packard
Inland Empire Paper Co.
Intel
Kimberly-Clark Corporation
Longview Fibre
Microsoft Corporation
*Norpac Foods
Oregon Steel Mills
PCC Structurals, 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 PacifiCorp Customers*

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

September 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

Re: Investigation to determine if PACIFIC POWER's rate revision has been
consistent with the methodologies and calculations required by Order No.
05-584
Docket No. UM 1442

Dear Filing Center:

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

Thank you for your assistance.

Sincerely yours,

/s/ Brendan E. Levenick
Brendan E. Levenick

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 service list, shown below, by causing the same to be sent by electronic mail to all parties, as well as, deposited in the U.S. Mail, postage-prepaid, to parties which have not waived paper service.

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

/s/ Brendan E. Levenick
Brendan E. Levenick

DEPARTMENT OF JUSTICE
MICHAEL T WEIRICH (C)
1162 COURT ST NE
SALEM OR 97301-4096
michael.weirich@doj.state.or.us

OREGON PUBLIC UTILITY COMMISSION
ED DURRENBERGER (C)
PO BOX 2148
SALEM OR 97308-2148
ed.durrenberger@state.or.us

PACIFIC POWER & LIGHT
JORDAN A WHITE
825 NE MULTNOMAH STE 1800
PORTLAND OR 97232
jordan.white@pacificorp.com

PORTLAND GENERAL ELECTRIC
DOUG KUNS
121 SW SALMON ST
1WTC0702
PORTLAND OR 97204
doug.kuns@pgn.com

PORTLAND GENERAL ELECTRIC
J RICHARD GEORGE
ASST GENERAL COUNSEL
121 SW SALMON ST 1WTC1301
PORTLAND OR 97204
richard.george@pgn.com

(W) = Waive Paper Service