

**BEFORE THE PUBLIC UTILITY COMMISSION**

**OF OREGON**

**UM 1443**

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

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 and consultants at the following address:

Melinda J. Davison	Randall J. Falkenberg
Irion A. Sanger	RFI Consulting, Inc.
Davison Van Cleve, P.C.	8343 Roswell Road
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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 (“PGE”), as indicated on Attachment A.

4. ICNU has a substantial interest in the Commission’s investigation to determine if PGE’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 PGE. 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 PGE’s largest customers. ICNU has participated in numerous other proceedings that affected PGE’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 15th day of September, 2009.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Irion A. Sanger

Melinda J. Davison

Irion A. Sanger

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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. (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

*\*Denotes PGE Customers*

# Davison Van Cleve PC

Attorneys at Law

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September 15, 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: In the Matter of PUBLIC UTILITY COMMISSION OF OREGON  
Investigation to determine if PORTLAND GENERAL ELECTRIC's rate  
revision has been consistent with the methodologies and calculations  
required by Order No. 05-584  
**Docket No. UM 1443**

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 15th day of September, 2009.

/s/ Brendan E. Levenick

Brendan E. Levenick

**DEPARTMENT OF JUSTICE**  
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**(W) = Waive Paper Service**