

# Davison Van Cleve PC

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August 12, 2010

***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 PORTLAND GENERAL ELECTRIC COMPANY  
Application for Deferral of Expenses Associated with a Photovoltaic  
Volumetric Incentive Rate Pilot.  
**Docket No. UM 1482**

Dear Filing Center:

Enclosed please find the original and one (1) copy 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,

/s/ Martin H. Patail  
Martin H. Patail

Enclosures

cc: Service List

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have this day served the foregoing Petition to Intervene on behalf 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 12th day of August, 2010.

Sincerely,

/s/ Martin H. Patail  
Martin H. Patail

**(W) CITIZENS' UTILITY BOARD OF OREGON**

Gordon Feighner (C)  
Robert Jenks (C)  
G. Catriona Mccracken (C)  
Raymond Myers (C)  
Kevin Elliott Parks (C)  
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**(W) OREGON PUBLIC UTILITY COMMISSION**

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**(W) PORTLAND GENERAL ELECTRIC**

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**(W) DEPARTMENT OF JUSTICE**

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**(W) PORTLAND GENERAL ELECTRIC**

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**(W) PORTLAND GENERAL ELECTRIC**

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**(W) OREGON DEPT. OF ENERGY**

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**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1482**

In the Matter of	)	
	)	
PORTLAND GENERAL ELECTRIC	)	PETITION TO INTERVENE OF THE
COMPANY	)	INDUSTRIAL CUSTOMERS OF
	)	NORTHWEST UTILITIES
Application for Deferral of Expenses	)	
Associated with a Photovoltaic Volumetric	)	
Incentive Rate Pilot.	)	

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

Irion A. Sanger Davison Van Cleve, P.C. 333 S.W. Taylor, Suite 400 Portland, OR 97204 E-Mail: ias@dvclaw.com Telephone: (503) 241-7242 Facsimile: (503) 241-8160	Randall J. Falkenberg RFI Consulting, Inc. 8343 Roswell Road PMB 362 Sandy Springs, 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 of ICNU's members are customers of Portland General Electric ("PGE"), as shown on Attachment A.

4. ICNU has a substantial interest in PGE's Application for Deferral of Expenses Associated with a Photovoltaic Volumetric Incentive Rate Pilot, which PGE filed on May 6, 2010. The filing proposes to defer costs that may be included in rates that PGE provides to ICNU's members.

5. ICNU has extensive experience with PGE's deferral requests, rates and with previous proceedings involving renewable resources. ICNU's intervention in this proceeding will assist the Commission in resolving the issues and will not unreasonably broaden the issues, burden the record, or 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 12th day of August, 2010.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Irion A. Sanger

Irion A. Sanger

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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

*\*Denotes PGE Customers*