

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1683**

In the Matter of	)	
	)	
PORTLAND GENERAL ELECTRIC	)	PETITION TO INTERVENE OF THE
COMPANY	)	INDUSTRIAL CUSTOMERS OF
	)	NORTHWEST UTILITIES
2015-2019 Renewable Portfolio Standard	)	
Implementation Plan	)	
_____	)	

Pursuant to ORS § 756.525 and OAR § 860-001-0300(2), 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 § 860-001-0010(7). In support of this petition, ICNU represents as follows:

1. The business address of ICNU is:  
  
Industrial Customers of Northwest Utilities  
818 SW 3rd Avenue, #266  
Portland, OR 97204
  
2. ICNU will be represented in this proceeding by Davison Van Cleve P.C.

All documents relating to this proceeding should be served on ICNU’s attorney and consultant at the following addresses:

Irion A. Sanger	Bradley Mullins
Davison Van Cleve, P.C.	Mountain West Analytics
333 S.W. Taylor, Suite 400	333 S.W. Taylor, Suite 400
Portland, OR 97204	Portland, OR 97204
E-Mail: <a href="mailto:ias@dvclaw.com">ias@dvclaw.com</a>	E-Mail: <a href="mailto:brmullins@mwanalytics.com">brmullins@mwanalytics.com</a>
Telephone: (503) 241-7242	
Facsimile: (503) 241-8160	

13. 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 Company ("PGE" or the "Company"), as shown in Attachment A.

4. ICNU has a substantial interest in PGE's 2015-2019 Renewable Portfolio Standard Implementation Plan ("RPS"), filed on December 31, 2013. The RPS provides information about how PGE will meet its RPS requirements in the years 2015 through 2019. ORS 469A requires electric utility companies to develop an implementation plan for meeting the requirements of the standard (at least 15 percent of electricity sold must come from qualifying resources in each of the calendar years 2015 through 2019). PGE intends to meet its RPS requirements with a combination of bundled renewable energy certificates from existing resources and the addition of new renewable resources. ICNU has a significant interest in PGE's RPS, since the incremental costs of compliance are expected to rise significantly, and may be included in PGE's rates paid by ICNU's members.

5. ICNU represents the interests of a number of large electric customers served by PGE in Oregon. ICNU's intervention in these proceedings 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 this proceeding. It is in the public interest to allow ICNU to intervene in this proceeding.

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

Dated this 15th day of January, 2014.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Irion A. Sanger

Irion A. Sanger

Davison Van Cleve, P.C.

333 S.W. Taylor, Suite 400

Portland, Oregon 97204

(503) 241-7242 telephone

(503) 241-8160 facsimile

ias@dvclaw.com

Of Attorneys for the Industrial Customers of Northwest  
Utilities

## ATTACHMENT A

### INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

Air Liquide  
Air Products  
Ampcor Rigid Plastics  
\*Boeing  
\*Boise Cascade, Inc.  
\*Boise Paper  
Certain Teed Gypsum & Ceiling Manufacturing (BPB)  
ConAgra Foods  
Dyno Nobel, Inc.  
Eka Chemicals, Inc.  
Emerald Performance Materials  
\*Evraz, Inc.  
Freres Lumber Co.  
\*Georgia-Pacific  
Grant PUD Industries  
Inland Empire Paper Co.  
\*Intel  
\*International Paper  
JR Simplot  
Kapstone Kraft Paper  
\*Linde, Inc.  
Microsoft Corporation  
\*Norpac Foods  
North Pacific Paper Corp  
Northwest Hardwoods  
\*PCC Structurals, Inc.  
Ponderay Newsprint  
PPG Industries Inc.  
REC Solar Grade Silicon LLC  
\*Schnitzer Steel  
Shell Oil Products US  
Simpson Paper & Timber  
\*SP Fiber Technologies  
Tesoro Refining and Marketing Co.  
Timber Products  
Wah Chang  
\*West Linn Paper Company  
Weyerhaeuser

*\*Denotes PGE 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

January 15, 2014

*Via Electronic Mail and Federal Express*

Public Utility Commission of Oregon  
Attn: Filing Center  
3930 Fairview Industrial Dr SE  
P.O. Box 1088  
Salem OR 97302

Re: PORTLAND GENERAL ELECTRIC  
2015-2019 Renewable Portfolio Standard Implementation Plan  
**Docket No. UM 1683**

Dear Filing Center:

Enclosed for filing in the above-referenced docket, please find the original and one (1) copy of the Petition to Intervene of the Industrial Customers of Northwest Utilities.

Thank you for your assistance, and please do not hesitate to call our office with any questions.

Sincerely,

/s/ Jesse Gorsuch  
Jesse Gorsuch

Enclosures  
cc: Service List

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have this day served the attached PETITION TO INTERVENE OF THE INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES upon all parties in this proceeding, as shown below, by causing the same to be sent via electronic mail only, as all parties have waived paper service.

Dated at Portland, Oregon, this 15th day of January, 2014.

/s/ Jesse Gorsuch  
Jesse Gorsuch

<p><b>(W)CITIZENS' UTILITY BOARD OF OREGON</b> OPUC DOCKETS ROBERT JENKS G. CATRIONA MCCRACKEN 610 SW BROADWAY, STE 400 PORTLAND, OR 97205 dockets@oregoncub.org bob@oregoncub.org Catriona@oregoncub.org</p>	<p><b>(W) PGE RATES &amp; REGULATORY AFFAIRS</b> PORTLAND GENERAL ELECTRIC COMPANY 121 SW SALMON STREET, 1WTC0702 PORTLAND, OR 97204 pge.opuc.filings@pgn.com</p>
<p><b>(W) PORTLAND GENERAL ELECTRIC</b> REBECCA T. BROWN 121 SW SALMON STREET, 1WTC07 PORTLAND, OR 97204 rebecca.brown@pgn.com</p>	<p><b>(W) PORTLAND GENERAL ELECTRIC</b> J. RICHARD GEORGE 121 SW SALMON STREET, 1WTC1301 PORTLAND, OR 97204 richard.george@pgn.com</p>
<p><b>(W) PUC STAFF – DEPARTMENT OF JUSTICE</b> JASON W. JONES BUSINESS ACTIVITIES SECTION 1162 COURT ST. NE SALEM, OR 97301-4096 jason.w.jones@state.or.us</p>	<p><b>(W) RENEWABLE NORTHWEST PROJECT</b> RNP DOCKETS MEGAN WALSETH DECKER 421 SW 6<sup>TH</sup> AVE, STE. 1125 PORTLAND, OR 97204 dockets@rnp.org megan@rnp.org</p>