

# Davison Van Cleve PC

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May 1, 2014

*Via E-Mail and Federal Express*

Public Utility Commission of Oregon  
Attn: Filing Center  
3930 Fairview Industrial Drive SE  
Salem OR 97302

Re: PACIFICORP dba PACIFIC POWER  
Application for Approval of Deferred Accounting and Prudence Determination  
Associated with the Energy Imbalance Market  
**Docket No. UM 1689**

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. If you have any questions, please do not hesitate to contact our office.

Sincerely,



Jesse O. 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 by sending a copy via electronic mail to the following parties at the following addresses.

Dated at Portland, Oregon, this 1st day of May, 2014.



Jesse O. Gorsuch

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

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**(W) MCDOWELL RACKNER & GIBSON PC**

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**(W) PACIFIC POWER, dba PACIFICORP**

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**(W) PUC STAFF – DEPARTMENT OF JUSTICE**

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**(W) PUBLIC UTILITY COMMISSION OF OREGON**

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**(W) PACIFIC POWER**

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**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1689**

In the Matter of	)	
	)	
PACIFICORP d/b/a PACIFIC POWER	)	PETITION TO INTERVENE OF THE
	)	INDUSTRIAL CUSTOMERS OF
Application for Approval of Deferred	)	NORTHWEST UTILITIES
Accounting and Prudence Determination	)	
<u>Associated with the Energy Imbalance Market</u>	)	

Pursuant to ORS § 756.525 and OAR § 860-001-0300(2), 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 § 860-001-0010(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 Ave., #266  
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:

S. Bradley Van Cleve	Tyler C. Pepple
Davison Van Cleve, P.C.	Davison Van Cleve, P.C.
333 S.W. Taylor, Suite 400	333 S.W. Taylor, Suite 400
Portland, OR 97204	Portland, OR 97204
Email: <a href="mailto:bvc@dvclaw.com">bvc@dvclaw.com</a>	Email: <a href="mailto:tcp@dvclaw.com">tcp@dvclaw.com</a>
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Facsimile: (503) 241-8160	Facsimile: (503) 241-8160

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 (or the "Company"), as shown on Attachment A.

4. ICNU has a substantial interest in PacifiCorp's Application for Approval of Deferred Accounting and Prudence Determination Associated with the Energy Imbalance Market ("EIM"), filed on April 18, 2014. PacifiCorp is requesting deferral of approximately \$5 million (on an Oregon-allocated basis) of start-up costs as well as \$425,000 (on an Oregon-allocated basis) of 2015 annual O&M costs associated with PacifiCorp's participation in the EIM. If the Commission grants PacifiCorp's request, it will substantially impact the rates of ICNU's PacifiCorp members.

5. ICNU has extensive experience with proceedings involving PacifiCorp. 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 this proceeding. 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 1st day of May, 2014.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.



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Of Attorneys for Industrial Customers  
of Northwest Utilities

**ATTACHMENT A**  
**INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES**

Air Liquide  
Air Products  
Akzo Nobel Pulp and Performance Chemicals, Inc.  
Amcort Rigid Plastics  
Axiall, Inc.  
Boeing  
\*Boise Cascade LLC  
\*Packaging Corporation of America  
Certain Teed Gypsum & Ceiling Manufacturing (BPB)  
ConAgra Foods  
Dyno Nobel, Inc.  
Emerald Performance Materials, LLC  
Evraz, Inc.  
\*Freres Lumber Co.  
\*Georgia-Pacific  
Grays Harbor Paper, L.P.  
Inland Empire Paper Co.  
Intel  
\*International Paper  
\*Kapstone Kraft Paper  
Linde, Inc.  
Microsoft Corporation  
\*Norpac Foods  
\*Northwest Hardwoods  
\*PCC Structural, Inc.  
Ponderay Newsprint  
REC Solar Grade Silicon LLC  
Schnitzer Steel  
SP Newsprint  
Shell Oil Products US  
Simpson Paper & Timber  
Tesoro Refining and Marketing Co.  
\*Timber Products  
\*Wah Chang  
West Linn Paper Company  
\*Weyerhaeuser

*\*Denotes PacifiCorp Customers*