

# Davison Van Cleve PC

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June 19, 2014

*Via Electronic Mail and Federal Express*

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

Re: PUBLIC UTILITY COMMISSION OF OREGON  
Voluntary Renewable Energy Tariffs for Non-Residential Customers / HB 4126  
**Docket No. UM 1690**

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 causing a copy to be sent via electronic mail to the following parties at the following addresses.

Dated at Portland, Oregon, this 19th day of June, 2014.

Sincerely,



Jesse O. Gorsuch

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**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1690**

In the Matter of	)	
	)	PETITION TO INTERVENE OF THE
PUBLIC UTILITY COMMISSION OF	)	INDUSTRIAL CUSTOMERS OF
OREGON	)	NORTHWEST UTILITIES
	)	
Voluntary Renewable Energy Tariffs for	)	
<u>Non-Residential Customers / HB 4126</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 this proceeding should be served on ICNU’s attorneys at the following addresses:

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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 PacifiCorp and Portland General Electric Company, two investor-owned utilities that may be affected by any policies adopted in this proceeding.

4. ICNU has a substantial interest in the outcome of this proceeding, which will guide the creation of a voluntary renewable energy tariff ("VRT") that complies with HB 4126. ICNU requests leave to intervene in this Docket to represent its members who could be affected by the implementation of the VRT.

5. 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.

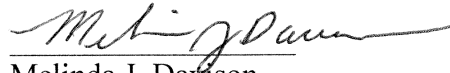
6. As described above, ICNU has a direct and substantial interest in this proceeding that will not be adequately represented by any other party, and may be affected by any Commission determination made in connection with this proceeding. It is in the public interest to allow ICNU to intervene in this proceeding.

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

Dated this 19th day of June, 2014.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.



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Of Attorneys for the Industrial Customers of  
Northwest Utilities



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

Air Liquide  
Air Products  
Akzo Nobel Pulp & Performance Chemicals  
Amcors Rigid Plastics  
Axiall, LLC  
\*Boeing  
#\*Boise Cascade, Inc.  
#\*Packaging Corporation of America  
Certain Teed Gypsum & Ceiling Manufacturing (BPB)  
ConAgra Foods  
Dyno Nobel, 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  
#Northwest Hardwoods  
#\*PCC Structurals, Inc.  
Ponderay Newsprint  
REC Solar Grade Silicon LLC  
RockTenn  
\*Schnitzer Steel  
Shell Oil Products US  
Simpson Timber  
\*SP Fiber Technologies  
Tesoro Refining and Marketing Co.  
#Timber Products  
#Wah Chang  
\*West Linn Paper Company  
#Weyerhaeuser

*\*Denotes PGE Customers*

*#Denotes PacifiCorp Customers*