

# Davison Van Cleve PC

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Suite 400  
333 SW Taylor  
Portland, OR 97204

June 25, 2014

*Via Electronic Mail and Federal Express*

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

Re: PORTLAND GENERAL ELECTRIC COMPANY  
2013 Power Cost Variance Mechanism  
**Docket No. UE 291**

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 25th day of June, 2014.

Sincerely,



Jesse O. Gorsuch

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

OPUC DOCKETS  
ROBERT JENKS  
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610 SW BROADWAY STE 400  
PORTLAND OR 97205  
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**(W) PUC STAFF - DEPARTMENT OF JUSTICE**

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BUSINESS ACTIVITIES SECTION  
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**(W) OREGON PUBLIC UTILITY COMMISSION**

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PO BOX 1088  
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**(W) PORTLAND GENERAL ELECTRIC**

PATRICK G. HAGAR – 1WTC0702  
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**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UE 291**

In the Matter of	)	
	)	
PORTLAND GENERAL ELECTRIC	)	PETITION TO INTERVENE OF THE
	)	INDUSTRIAL CUSTOMERS OF
2013 Annual Power Cost Variance	)	NORTHWEST UTILITIES
Mechanism.	)	
_____	)	

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 and consultant at the following addresses:

S. Bradley Van Cleve  
Davison Van Cleve, P.C.  
333 S.W. Taylor, Ste. 400  
Portland, OR 97204  
E-Mail: [bvc@dvclaw.com](mailto:bvc@dvclaw.com)  
Telephone: (503) 241-7242  
Facsimile: (503) 241-8160

Jesse E. Cowell  
Davison Van Cleve, P.C.  
333 S.W. Taylor, Ste. 400  
Portland, OR 97204  
E-Mail: [jec@dvclaw.com](mailto:jec@dvclaw.com)  
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Bradley G. Mullins  
333 SW Taylor, Ste. 400  
Portland, OR 97204  
E-Mail : brmullins@mwanalytics.com  
Telephone : (503) 954-2852  
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 Portland General Electric Company ("PGE"), as shown on Attachment A.

4. ICNU has a substantial interest in PGE's 2013 Annual Power Cost Variance Mechanism ("PCVM"), which was filed with the Commission on June 3, 2014. PGE states that its actual power costs were \$11.0 million greater than forecasted in rates; however, the PCVM includes a deadband under which small differences between actual and forecasted power costs are not charged or refunded to customers. ICNU requests leave to intervene in this Docket to investigate and represent its members who are affected by the operation of PGE's 2013 PCVM, which could impact the rates and quality of service that PGE provides to ICNU's members.

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.

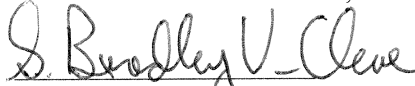
6. As described above, ICNU has a direct and substantial interest in this proceeding that will not be adequately represented by any other party, and may be affected by any Commission determination made in connection with this proceeding. It is in the public interest to allow ICNU to intervene in this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

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

Dated this 25th day of June, 2014.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.



S. Bradley Van Cleve

Jesse E. Cowell

333 S.W. Taylor, Suite 400

Portland, Oregon 97204

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bvc@dvclaw.com

jec@dvclaw.com

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*