

Davison Van Cleve PC

TEL (503) 241-7242 • FAX (503) 241-8160 • mail@dvclaw.com

Suite 400
333 SW Taylor
Portland, OR 97204

September 18, 2014

Via E-mail and Federal Express

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

Re: In the Matter of Sierra Club
Regarding violation of Protective Order No. 13-095.
Docket No. UM 1707

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 ICNU** 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 18th day of September, 2014.



Jesse O. Gorsuch

(W) CITIZENS' UTILITY BOARD OF OREGON

OPUC DOCKETS
ROBERT JENKS
G. CATRIONA MCCRACKEN
610 SW BROADWAY, STE 400
PORTLAND OR 97205
dockets@oregoncub.org
bob@oregoncub.org
catriona@oregon.org

(W) PUC STAFF – DEPARTMENT OF JUSTICE

JASON W. JONES
BUSINESS ACTIVITIES SECTION
1162 COURT ST NE
SALEM, OR 97301-4796
jason.w.jones@state.or.us

**(W) PARKS LAW OFFICES, LLC
KEVIN E. PARKS**

310 SW 4TH AVE., STE. 806
PORTLAND, OR 97204
kevin@parks-law-offices.com

(W) SIERRA CLUB LAW PROGRAM

GLORIA D. SMITH
85 SECOND STREET
SAN FRANCISCO, CA 94105
gloria.smith@sierraclub.org

(W) PACIFIC POWER

SARAH WALLACE
825 NE MULTNOMAH ST, STE 1800
PORTLAND, OR 97232
sarah.wallace@pacificcorp.com

included as Attachment A. Many of ICNU's members are customers of PacifiCorp (or the "Company"), as shown in Attachment A.

4. ICNU is an intervening party to LC 57, concerning PacifiCorp's 2013 Integrated Resource Plan ("IRP"). ICNU's counsel and consultant are also signatories to Protective Order No. 13-095, which governs the access to and review of confidential information in LC 57, and the alleged violation of which, by another intervening party to LC 57, Sierra Club, forms the basis for the creation of this docket. Accordingly, matters pertaining to PacifiCorp's 2013 IRP and the alleged violation of Protective Order No. 13-095 by an intervening party to LC 57 are of substantial interest to ICNU. Further, determinations made in this docket regarding the permissible use of information relating to LC 57 may ultimately have a bearing on rates, as PacifiCorp's 2013 IRP will provide guidelines regarding which resources PacifiCorp acquires in the future, which would impact the rates and quality of service that PacifiCorp provides to ICNU's members.

5. ICNU represents the interests of a number of large electric customers served by PacifiCorp in Oregon. ICNU has participated in many integrated resource plan proceedings before the Commission, including both LC 57 and PacifiCorp's 2011 IRP, which was docketed as LC 52, and in such proceedings ICNU counsel and consultants have been signatories to protective orders governing the use of IRP information. ICNU will not unreasonably broaden the issues, burden the record, or delay this proceeding.

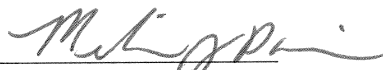
6. As described above, ICNU has a direct and substantial interest in this proceeding that will not be adequately represented by any other party, and may be affected by any Commission determination made in connection with this proceeding. It is in the public interest to allow ICNU to intervene in this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

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

Dated this 18th day of September, 2014.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.



Melinda J. Davison

Jesse E. Cowell

Davison Van Cleve, P.C.

333 S.W. Taylor, Suite 400

Portland, Oregon 97204

(503) 241-7242 telephone

(503) 241-8160 facsimile

mjd@dvclaw.com

jec@dvclaw.com

Of Attorneys for Industrial Customers
of Northwest Utilities

ATTACHMENT A
INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

Air Liquide
Air Products
Akzo Nobel Pulp & Performance Chemicals
Ancor Rigid Plastics
Boeing
*Boise Cascade, LLC
*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
Linde, Inc.
*Longview Fibre
Microsoft Corporation
*Norpac Foods
North Pacific Paper Corp
*Northwest Hardwoods
*PCC Structurals, Inc.
Ponderay Newsprint
PPG Industries Inc.
REC Solar Grade Silicon LLC
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 PacifiCorp Customers*