BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UE 294

In the Matter of)	
)	AMENDED PETITION TO
PORTLAND GENERAL ELECTRIC)	INTERVENE OF THE INDUSTRIAL
COMPANY)	CUSTOMERS OF NORTHWEST
)	UTILITIES
Request for a General Rate Revision.)	
)	

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). ICNU files this Amended Petition to Intervene to identify those persons who should receive a Huddle account, pursuant to the Commission's February 5, 2015 Memorandum in this proceeding. 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 Telephone: (503) 241-7242 Facsimile: (503) 241-8160 Bradley G. Mullins 333 S.W. Taylor, Ste. 400 Portland, OR 97204

E-Mail: brmullins@mwanalytics.com

Telephone: (503) 954-2852 Facsimile: (503) 241-8160

Tyler C. Pepple Davison Van Cleve, P.C. 333 S.W. Taylor, Ste. 400 Portland, OR 97204

E-Mail: tcp@dvclaw.com Telephone: (503) 241-7242 Facsimile: (503) 241-8160

3. ICNU requests that the Commission assign Huddle accounts to the below individuals, each of whom is a qualified person as defined in the protective order in this proceeding. ICNU also requests that each of the below individuals be given access to post documents in this proceeding:

Tyler C. Pepple

E-Mail: tcp@dvclaw.com

Bradley G. Mullins

E-Mail: brmullins@mwanalytics.com

Jesse O. Gorsuch

E-Mail: jog@dvclaw.com

- 4. 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 members of ICNU are customers of Portland General Electric Company ("PGE"), as indicated on Attachment A.
- 5. ICNU has a substantial interest in the outcome of PGE's 2015 General Rate Case ("GRC"). The proposed rate change under the terms of PGE's GRC would substantially and directly affect those of ICNU's members who purchase power from PGE. ICNU requests leave to intervene in this Docket to represent its members who are affected by any change to PGE's rates.
- 6. ICNU represents the interests of many of PGE's largest customers. ICNU has participated in prior PGE general rate cases, including Docket Nos. UE 180, UE 197, UE 215, UE 262, and UE 283 as well as PGE's most recent net variable power cost proceedings,

Docket Nos. UE 181, UE 198, UE 208, UE 228, UE 250, and UE 286. 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.

7. 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 20th day of February, 2015.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

S. Bradley Van Cleve

Tyler C. Pepple

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Of Attorneys for the Industrial Customers of

Northwest Utilities

ATTACHMENT A

INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

Air Liquide

Air Products

AkzoNoebel

Alcoa

Amcor Rigid Plastics

Axiall, Inc.

*Boeing

*Boise Cascade, Inc.

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 Corp

International Paper

*JR Simplot

Kapstone Kraft Paper

*Linde, Inc.

Microsoft Corporation

*Norpac Foods

Northwest Hardwoods

*Packaging Corporation of America

*PCC Structurals, Inc.

Ponderay Newsprint

REC Solar Grade Silicon LLC

RockTenn

*Schnitzer Steel

Shell Oil Products US

*SP Fiber Technologies

Tesoro Refining and Marketing Co.

Timber Products

Wah Chang

*West Linn Paper Company

*Weyerhaeuser

^{*}Denotes PGE Customers

Davison Van Cleve PC

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

Suite 400 333 SW Taylor Portland, OR 97204

February 20, 2015

Via E-Mail and Federal Express

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

Re:

PORTLAND GENERAL ELECTRIC

2015 General Rate Case **Docket No. UE 294**

Dear Filing Center:

Enclosed for filing in the above-referenced docket, please find the original and one (1) copy of the Amended 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 foregoing Amended

Petition to Intervene of the Industrial Customers of Northwest Utilities upon all parties in

this proceeding, as shown below, by sending a copy via electronic mail.

Dated at Portland, Oregon, this 20th day of February, 2015.

Jesse O. Gorsuch

(W) CITIZENS' UTILITY BOARD OF OREGON

OPUC DOCKETS
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SOMMER TEMPLET
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PORTLAND OR 97205
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(W) PUC STAFF – DEPARTMENT OF JUSTICE

JOHANNA RIEMENSCHNEIDER BUSINESS ACTIVITIES SECTION 1162 COURT ST NE SALEM, OR 97301-4796 johanna.riemenschneider@doj.state.or.us

(W) PORTLAND GENERAL ELECTRIC

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