## BEFORE THE PUBLIC UTILITY COMMISSION

#### OF OREGON

### **UE 294**

In the Matter of	)	
DODEL AND GENERAL DI DOEDIG	)	PETITION TO INTERVENE OF THE
PORTLAND GENERAL ELECTRIC	)	INDUSTRIAL CUSTOMERS OF
COMPANY	)	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). 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 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

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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

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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 members of ICNU are customers of Portland General Electric

Company ("PGE"), as indicated on Attachment A.

ICNU has a substantial interest in the outcome of PGE's 2015 General 4.

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.

5. 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.

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

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DAVISON VAN CLEVE, P.C. 333 S.W. Taylor, Suite 400 Portland, OR 97204

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 17th 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

<sup>\*</sup>Denotes PGE Customers

# Davison Van Cleve PC

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Suite 400 333 SW Taylor Portland, OR 97204

February 17, 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 Petition to Intervene of the Industrial Customers of Northwest Utilities.

Thank you for your assistance, and please do not hesitate to call our office with any questions.

Sincerely,

Jesse O. Gorsuch

Enclosures

cc:

Service List

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have this day served the foregoing **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 17th day of February, 2015.

Jesse O. Gorsuch

## (W) CITIZENS' UTILITY BOARD OF OREGON

OPUC DOCKETS
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SOMMER TEMPLET
610 SW BROADWAY, STE 400
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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# (W) PUBLIC UTILITY COMMISSION OF OREGON

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