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April 4, 2017

Via Electronic Filing

Public Utility Commission of Oregon
Attn: Filing Center
201 High St. SE, Suite 100
Salem OR 97301

Re: In the Matter of PUBLIC UTILITY COMMISSION OF OREGON,
Investigation into PacifiCorp, dba PACIFIC POWER's
Oregon-Specific Cost Allocation Issues.
Docket No. UM 1824

Dear Filing Center:

Please find enclosed the Petition to Intervene of the Industrial Customers of Northwest Utilities in the above-referenced docket.

Thank you for your assistance. If you have any questions, please do not hesitate to call.

Sincerely,

/s/ Jesse O. Gorsuch
Jesse O. Gorsuch

Enclosure

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1824

In the Matter of)	
)	
PUBLIC UTILITY COMMISSION OF)	PETITION TO INTERVENE OF THE
OREGON)	INDUSTRIAL CUSTOMERS OF
)	NORTHWEST UTILITIES
Investigation into PacifiCorp, dba PACIFIC)	
POWER's Oregon-Specific Cost Allocation)	
Issues.)	

Pursuant to ORS § 756.525 and OAR § 860-001-0300(2), the Industrial Customers of Northwest Utilities (“ICNU”) petitions the Public Utility Commission of Oregon (“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 Avenue, #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 attorney and independent consultant at the following addresses:

Jesse E. Cowell	Bradley G. Mullins
Davison Van Cleve, P.C.	333 S.W. Taylor, Ste. 400
333 S.W. Taylor, Suite 400	Portland, OR 97204
Portland, OR 97204	E-Mail: brmullins@mwanalytics.com
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Telephone: (503) 241-7242	Facsimile: (503) 241-8160
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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 (or, the "Company"), as indicated on Attachment A.

4. ICNU has a substantial interest in the Commission's investigation into PacifiCorp's Oregon-specific cost allocation issues, which the Commission formally opened via Order No. 17-124, issued in Docket No. UM 1050 on March 29, 2017. The outcome of this proceeding may impact the future rates and services of ICNU members who take service from PacifiCorp in Oregon. As such, ICNU members stand to be directly and substantially impacted by the results of this proceeding.

5. ICNU represents the interests of large electric customers served by the Company in Oregon, and in this capacity routinely participates in proceedings affecting PacifiCorp's rates and customer service. This includes recent participation in Docket No. UM 1050, as well as continuing involvement in the Company's multi-state process. ICNU intends to address issues that could have a significant impact on future customer rates and service. ICNU's intervention in this proceeding will assist the Commission in resolving the issues and 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 connected with this proceeding. Accordingly, 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 4th day of April, 2017.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Jesse E. Cowell

Jesse E. Cowell

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Of Attorneys for the Industrial Customers of
Northwest Utilities

ATTACHMENT A
MEMBERS OF THE INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

Air Liquide
Air Products
AkzoNobel
Alcoa
Amcors Rigid Plastics
Axiall, Inc.
#Boeing
#Boise Cascade, LLC
Certain Teed Gypsum & Ceiling Manufacturing (BPB)
#Columbia Steel
ConAgra Foods
Darigold
Dyno Nobel, Inc.
Emerald Performance Materials, LLC
Evraz, Inc.
#Freres Lumber Co.
#Georgia-Pacific
Grant PUD Industries
Inland Empire Paper Co.
Intel Corp
#International Paper
J.R. Simplot
#Kapstone Kraft Paper
#Legacy Health
Linde, Inc.
Microsoft Corporation
#Norpac Foods
#Northwest Hardwoods
#Packaging Corporation of America
#PCC Structurals, Inc.
Ponderay Newsprint
REC Solar Grade Silicon LLC
Schnitzer Steel
Shell Oil Products US
Tesoro Refining and Marketing Co.
#Timber Products, Inc.
#Wah Chang
WestRock
West Linn Paper Company
#Weyerhaeuser

#Denotes PacifiCorp Customers