

# Davison Van Cleve PC

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May 16, 2016

## *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 PORTLAND GENERAL ELECTRIC CO.  
Request for Proposals for Selection of an Independent Evaluator  
**Docket No. UM 1834**

Dear Filing Center:

Enclosed for filing in the above-referenced docket, please find 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 call.

Sincerely,

/s/ Haley M. Thomas  
Haley M. Thomas

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION**

**OF OREGON**

**UM 1834**

In the Matter of )  
 )  
PORTLAND GENERAL ELECTRIC ) PETITION TO INTERVENE OF THE  
COMPANY ) INDUSTRIAL CUSTOMERS OF  
 ) NORTHWEST UTILITIES  
 )  
Request for Proposals for Selection of an )  
Independent Evaluator. )

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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 attorney and consultant at the following addresses:

Tyler C. Pepple  
Davison Van Cleve, P.C.  
333 S.W. Taylor, Ste. 400  
Portland, OR 97204  
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Telephone: (503) 241-7242  
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Bradley G. Mullins  
333 S.W. Taylor, Ste. 400  
Portland, OR 97204  
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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.

4. ICNU has a substantial interest in the outcome of PGE’s Request for Proposals for the selection of an Independent Evaluator (“IE”). The IE selected through this process will oversee any request for proposals PGE issues following its Integrated Resource Plan, which ultimately is likely to substantially and directly affect the rates 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 a number of large electric customers served by PGE in Oregon. 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 16th day of May, 2017.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

Tyler C. Pepple

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Portland, Oregon 97204

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Of Attorneys for the Industrial Customers of  
Northwest Utilities

**ATTACHMENT A**  
**MEMBERS OF INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES**

Airgas USA, LLC  
Air Liquide  
Air Products  
AkzoNobel  
Alcoa  
Amcors Rigid Plastics  
Axiall, Inc.  
\*Boeing  
\*Boise Cascade, LLC  
Columbia Steel  
ConAgra Foods  
\*Darigold  
Dyno Nobel, Inc.  
Emerald Performance Materials, LLC  
\*Evraz, Inc.  
Freres Lumber Co.  
\*Georgia-Pacific  
Inland Empire Paper Co.  
\*Intel Corp  
\*International Paper  
\*J.R. Simplot  
Kapstone Kraft Paper  
\*Legacy Health  
\*Linde, Inc.  
Microsoft Corporation  
Nippon Dynawave Packaging Co.  
\*Norpac Foods  
North Pacific Paper Co.  
Northwest Hardwoods  
\*Packaging Corporation of America  
Ponderay Newsprint  
Precision Castparts  
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 PGE Customers*