

# Davison Van Cleve PC

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June 6, 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 PACIFICORP's Application for Approval of 2017R  
Request for Proposals  
**Docket No. UM 1845**

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

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1845**

In the Matter of	)	
	)	
PACIFICORP, dba PACIFIC POWER,	)	PETITION TO INTERVENE OF THE
	)	INDUSTRIAL CUSTOMERS OF
PacifiCorp’s Application for Approval of	)	NORTHWEST UTILITIES
2017R Request for Proposals.	)	
_____	)	

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 (the “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 attorneys and independent consultant at the following addresses:

Jesse E. Cowell  
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3. ICNU is an incorporated, non-profit association of large 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 shown in Attachment A.

4. ICNU has a substantial interest in PacifiCorp's Application for Approval of 2017R Request for Proposals ("RFP"), which the Company filed on June 2, 2017. The RFP process would solicit up to 1,270 MW of new wind resources. In addition, via Commission order, PacifiCorp has requested the appointment of an independent evaluator ("IE") to oversee the RFP process. Both the IE appointment and subsequent RFP process could have significant, direct impacts on ICNU member rates, especially considering the magnitude of new wind resources contemplated by the Company within a short time frame.

5. ICNU represents the interests of several large electric customers served by PacifiCorp in Oregon. ICNU regularly participates in Company proceedings before the Commission, including PacifiCorp's ongoing 2017 integrated resource plan ("IRP") proceeding, which was docketed as LC 67. ICNU's participation in the Company's 2017 IRP process is particularly relevant to the 2017R RFP approval application, since PacifiCorp states that the 2017R RFP is aligned with resource opportunities identified in the 2017 IRP. In this proceeding, ICNU intends to address issues that could have a significant impact on future customer rates. 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. 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 6th day of June, 2016

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Jesse E. Cowell

Jesse E. Cowell

Davison Van Cleve, P.C.

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Of Attorneys for Industrial Customers

of Northwest Utilities

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

Airgas USA, LLC  
Air Liquide  
Air Products  
AkzoNobel  
Alcoa  
Amcor Rigid Plastics  
Axiall, Inc.  
#Boeing  
#Boise Cascade, Inc.  
#Columbia Steel  
ConAgra Foods  
Darigold  
Dyno Nobel, Inc.  
Emerald Performance Materials  
Evraz, Inc.  
#Freres Lumber Co.  
#Georgia-Pacific  
Inland Empire Paper Co.  
Intel Corp  
International Paper  
JR 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  
#PCC Structurals, Inc.  
Ponderay Newsprint  
REC Solar Grade Silicon LLC  
Schnitzer Steel  
Shell Oil Products US  
Tesoro Refining and Marketing Co.  
#Timber Products  
#Wah Chang  
WestRock  
West Linn Paper Company  
#Weyerhaeuser

*\*Denotes PacifiCorp Customers*