

Davison Van Cleve PC

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November 3, 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 PORTLAND GENERAL ELECTRIC COMPANY,
Draft Storage Potential Evaluation
Docket Nos. UM 1856

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 1856

In the Matter of)
)
PORTLAND GENERAL ELECTRIC) PETITION TO INTERVENE OF THE
COMPANY,) INDUSTRIAL CUSTOMERS OF
) NORTHWEST UTILITIES
)
Draft Storage Potential Evaluation.)
_____)

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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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 Draft Storage Potential Evaluation, which will inform PGE’s efforts to procure energy storage. The costs of the Company’s proposed energy storage projects may impact the rates paid by those of ICNU’s members who purchase power from PGE. ICNU therefore 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 3d day of November, 2017.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

Tyler C. Pepple

333 S.W. Taylor, Suite 400

Portland, Oregon 97204

(503) 241-7242 (phone)

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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
Ampcor Rigid Plastics
Axiall, Inc.
*Boeing
*Boise Cascade, Inc.
Columbia Steel
*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
Lamb Weston
*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 Co.
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 NR Co.

**Denotes PGE Customers*