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January 24, 2018

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, dba PACIFIC POWER
Draft Storage Potential Evaluation
Docket No. UM 1857

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 1857

In the Matter of)
)
PACIFICORP, dba PACIFIC POWER,) PETITION TO INTERVENE OF THE
) INDUSTRIAL CUSTOMERS OF
) NORTHWEST UTILITIES
Draft Energy 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 attorneys at the following addresses:

Tyler C. Pepple
Davison Van Cleve, P.C.
333 S.W. Taylor, Ste. 400
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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 PacifiCorp (or the “Company”), as indicated on Attachment A.

4. ICNU has a substantial interest in the outcome of PacifiCorp’s Draft Storage Potential Evaluation, which will inform PacifiCorp’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 PacifiCorp. ICNU therefore requests leave to intervene in this Docket to represent its members who are affected by any change to PacifiCorp’s rates.

5. ICNU represents the interests of a number of large electric customers served by PacifiCorp 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 24th day of January, 2018.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

Tyler C. Pepple

Riley G. Peck

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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
Solvay Chemicals
Tesoro Refining and Marketing Co.
Timber Products
#Wah Chang
WestRock
#Weyerhaeuser NR Co.

#Denotes PacifiCorp Customers