

# Davison Van Cleve PC

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January 15, 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  
2019-2023 Renewable Portfolio Standard Implementation Plan  
**Docket No. UM 1914**

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 1914**

In the Matter of )  
 )  
PACIFICORP, dba PACIFIC POWER, ) PETITION TO INTERVENE OF THE  
 ) INDUSTRIAL CUSTOMERS OF  
 ) NORTHWEST UTILITIES  
2019-2023 Renewable Portfolio Standard )  
Implementation Plan. )  
\_\_\_\_\_ )

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 and independent consultant at the following addresses:

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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, as indicated on Attachment A.

4. On December 28, 2017, PacifiCorp filed its 2019-2023 Renewable Portfolio Standard (“RPS”) Implementation Plan, which details how the Company intends to meet its RPS requirements in the years 2019-2023. Under ORS 469A, electric utility companies must develop an implementation plan for meeting the RPS, which requires that at least 15 percent of electricity sold must come from qualifying resources in calendar year 2019, and 20 percent in calendar years 2020-2023. The Company plans to meet its RPS targets during this period with a mix of bundled and unbundled renewable energy certificates (“RECs”) from existing Oregon-eligible resources and RECs from resources under development that are anticipated to be Oregon RPS-eligible. ICNU has a substantial interest in PacifiCorp’s RPS plan, as the costs of compliance could rise significantly, and may be included in PacifiCorp’s rates paid by ICNU’s members.

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.

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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 15th 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*