BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

LC 52

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In the Matter of	
PACIFICORP	
2011 Integrated Resource Plan.	

PETITION TO INTERVENE OF THE INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

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

("OPUC" or 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:

Michael Early Industrial Customers of Northwest Utilities 1300 SW 5th Ave, Suite 1750 Portland, OR 97201

2. ICNU will be represented in this proceeding by Davison Van Cleve P.C.

All documents relating to these proceedings should be served on ICNU's attorneys and

consultant at the following addresses:

Irion Sanger Davison Van Cleve, P.C. 333 S.W. Taylor, Suite 400 Portland, OR 97204 E-Mail: mail@dvclaw.com ias@dvclaw.com Telephone: (503) 241-7242 Facsimile: (503) 241-8160 Donald W. Schoenbeck Regulatory & Cogeneration Services, Inc. 900 Washington Street, Suite 780 Vancouver, WA 98660 E-Mail: dws@r-c-s-inc.com Telephone: (503) 232-6155 Facsimile: (360) 737-7628

PAGE 1 – PETITION TO INTERVENE OF ICNU

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 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 2011 Integrated Resource Plan ("IRP"), filed on March 31, 2011. The Company also plans to file a supplement to the IRP with the results of additional studies on energy efficiency avoided costs and Energy Gateway transmission analysis. Any Commission decision regarding PacifiCorp's 2011 IRP will provide guidelines regarding which resources PacifiCorp acquires in the future, which would impact the rates and quality of service that PacifiCorp provides to ICNU's members.

5. ICNU represents the interests of a number of large electric customers in the State of Oregon. ICNU has participated in many previous least cost proceedings before the Commission, including PacifiCorp's 2008 IRP, which was docketed as LC 47. 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 made in connection with this proceeding. It is in the public interest to allow ICNU to intervene in this proceeding.

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WHEREFORE, ICNU respectfully requests that the Commission grant its petition to intervene

with full party status in this proceeding.

Dated this 12th day of April, 2011.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

<u>/s/ Irion Sanger</u> Irion Sanger Davison Van Cleve, P.C. 333 S.W. Taylor, Suite 400 Portland, Oregon 97204 (503) 241-7242 telephone (503) 241-8160 facsimile mail@dvclaw.com Of Attorneys for Industrial Customers of Northwest Utilities

PAGE 3 – PETITION TO INTERVENE OF ICNU

ATTACHMENT A INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

Air Liquide Air Products Amcor PET Packaging USA, Inc. Certain Teed Gypsum & Ceiling Manufacturing (BPB) Blue Heron Paper Company Boeing *Boise Cascade LLC *Boise Paper *ConAgra Foods Dyno Nobel, Inc. Eka Chemicals, Inc. Emerald Kalama Chemical, LLC Equa-Chlor, LLC Evraz, Inc. *Freres Lumber Co. *Georgia-Pacific Grays Harbor Paper, L.P. *Hewlett-Packard Inland Empire Paper Co. Intel Kimberly-Clark Corporation Linde, Inc. Longview Fibre Microsoft Corporation *Norpac Foods PCC Structurals, Inc. **REC Solar Grade Silicon LLC** SP Newsprint Shell Oil Products US Simpson Paper & Timber Tesoro Refining and Marketing Co. *Wah Chang West Linn Paper Company *Weyerhaeuser

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*Denotes PacifiCorp Customers

Davison Van Cleve PC

Attorneys at Law TEL (503) 241-7242 • FAX (503) 241-8160 • mail@dvclaw.com Suite 400 333 SW Taylor Portland, OR 97204

April 12, 2011

Via Electronic and U.S. Mail

Public Utility Commission Attn: Filing Center 550 Capitol St. NE #215 P.O. Box 2148 Salem OR 97308-2148

In the Matter of PACIFICORP's 2011 Integrated Resource Plan. Re: **Docket No. LC 52**

Dear Filing Center:

Enclosed please find the original Petition to Intervene on behalf of the Industrial Customers of Northwest Utilities in the above-referenced docket.

Thank you for your assistance.

Sincerely,

/s/ Sarah A. Kohler Sarah A. Kohler

Enclosures cc: Service List

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing Petition to

Intervene on behalf of the of the Industrial Customers of Northwest Utilities upon the parties, on

the service list, by causing the same to be deposited in the U.S. Mail, postage-prepaid, and via

electronic mail.

Dated at Portland, Oregon, this 12th day of April, 2011.

Sincerely,

/s/ Sarah A. Kohler Sarah A. Kohler

(W) CITIZENS UTILITY BOARD OF OREGON GORDON FEIGHNER ROBERT JENKS G. CATRIONA MCCRACKEN 610 SW BROADWAY, STE 400 PORTLAND OR 97205 gordon@oregoncub.org bob@oregoncub.org catriona@oregoncub.org	(W) PACIFIC POWER & LIGHT JORDAN A WHITE 1407 W. NORTH TEMPLE, STE 320 SALT LAKE CITY UT 84116 jordan.white@pacificorp.com
(W) PACIFICORP ENERGY PETE WARNKEN 825 NE MULTNOMAH - STE 600 PORTLAND OR 97232 irp@pacificorp.com	(W) PACIFICORP OREGON DOCKETS 825 NE MULTNOMAH ST, STE 2000 PORTLAND OR 97232 oregondockets@pacificorp.com
(W) PUBLIC UTILITY COMMISSION OF OREGON KELCEY BROWN PO BOX 2148 SALEM OR 97301 kelcey.brown@state.or.us	