## Davison Van Cleve PC

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May 14, 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 2013 Integrated Resource Plan. Re:

> > Docket No. LC 57

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/ Jesse Gorsuch Jesse Gorsuch

**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 all parties of record in this proceeding by sending a copy via electronic mail to each individual's last-known email address, as listed below.

Dated this 14<sup>th</sup> day of May, 2013.

Davison Van Cleve, P.C.

/s/ Jesse Gorsuch
Jesse Gorsuch

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PORTLAND GENERAL ELECTRIC (W) PUC STAFF -- DEPARTMENT OF JUSTICE (W) PATRICK G. HAGER JASON W JONES (C) **BUSINESS ACTIVITIES SECTION BRIAN KUEHNE** V. DENISE SAUNDERS 1162 COURT ST NE 121 SW SALMON ST 1WTC0702 **SALEM OR 97301-4096 PORTLAND OR 97204** jason.w.jones@state.or.us pge.opuc.filings@pgn.com patrick.hager@pgn.com brian.kuehne@pgn.com denise.saunders@pgn.com RENEWABLE NORTHWEST PROJECT (W) SIERRA CLUB LAW PROGRAM (W) MEGAN WALSETH DECKER (C) **DEREK NELSON** GLORIA D. SMITH RNP DOCKETS 85 SECOND ST. 2<sup>ND</sup> FLOOR 421 SW 6TH AVE #1125 **PORTLAND OR 97204-1629** SAN FRANCISCO, CA 94105 derek.nelson@sierraclub.org megan@rnp.org dockets@rnp.org gloria.smith@sierraclub.org SIERRA CLUB ENVIRONMENTAL LAW **PROGRAM** TRAVIS RITCHIE 85 SECOND STREET, 2ND FL SAN FRANCISCO CA 94105 travis.ritchie@sierraclub.org

#### BEFORE THE PUBLIC UTILITY COMMISSION

#### **OF OREGON**

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In the Matter of	)	
PACIFICORP, dba PACIFIC POWER	)	PETITION TO INTERVENE OF THE INDUSTRIAL CUSTOMERS OF
	)	NORTHWEST UTILITIES
2013 Integrated Resource Plan.	)	

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:

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 these proceedings should be served on ICNU's attorneys and consultant at the following addresses:

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Davison Van Cleve, P.C. Regulatory & Cogeneration Services, Inc.
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ICNU is an incorporated, non-profit association of large industrial electric 3.

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.

ICNU has a substantial interest in PacifiCorp's 2013 Integrated Resource 4.

Plan ("IRP"), filed on April 30, 2013. The Company's analysis of its future load and regulatory

obligations, along with its proposed plan of action over the next two to four years, may have a

direct bearing on rates. Any Commission decision regarding PacifiCorp's 2013 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.

ICNU represents the interests of a number of large electric customers 5.

served by PacifiCorp in Oregon. ICNU has participated in many previous integrated resource

plan proceedings before the Commission, including PacifiCorp's 2011 IRP, which was docketed

as LC 52. 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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DAVISON VAN CLEVE, P.C. 333 S.W. Taylor, Suite 400 Portland, OR 97204

# WHEREFORE, ICNU respectfully requests that the Commission grant its petition to intervene with full party status in this proceeding.

Dated this 14th day of May, 2013

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Irion A. Sanger
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of Northwest Utilities

### ATTACHMENT A INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

Air Liquide

Air Products

**Amcor Rigid Plastics** 

\*Boeing

\*Boise Cascade, Inc.

\*Boise Paper

Certain Teed Gypsum & Ceiling Manufacturing (BPB)

\*ConAgra Foods

Dyno Nobel, Inc.

Eka Chemicals, Inc.

**Emerald Performance Materials** 

Evraz, Inc.

\*Freres Lumber Co.

\*Georgia-Pacific

**Grant PUD Industries** 

Inland Empire Paper Co.

Intel

\*International Paper

JR Simplot

Linde, Inc.

\*Longview Fibre

Microsoft Corporation

\*Norpac Foods

North Pacific Paper Corp

\*Northwest Hardwoods

\*PCC Structurals, Inc.

Ponderay Newsprint

PPG Industries Inc.

**REC Solar Grade Silicon LLC** 

Shell Oil Products US

Simpson Paper & Timber

SP Fiber Technologies

Tesoro Refining and Marketing Co.

\*Timber Products

\*Wah Chang

West Linn Paper Company

\*Weyerhaeuser

<sup>\*</sup>Denotes PacifiCorp Customers