

# Davison Van Cleve PC

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333 SW Taylor  
Portland, OR 97204

May 1, 2014

*Via E-Mail and Federal Express*

Public Utility Commission of Oregon  
Attn: Filing Center  
3930 Fairview Industrial Drive SE  
Salem OR 97302

Re: PORTLAND GENERAL ELECTRIC COMPANY  
Renewable Resources Adjustment Clause  
**Docket No. UE 288**

Dear Filing Center:

Enclosed for filing in the above-referenced docket, please find the original and one (1) copy of the Petition to Intervene of the Industrial Customers of Northwest Utilities.

Thank you for your assistance, and please do not hesitate to call our office with any questions.

Sincerely,



Jesse O. Gorsuch

Enclosures

cc: Service List

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have this day served the attached **Petition to Intervene of the Industrial Customers of Northwest Utilities** upon all parties in this proceeding by sending a copy via electronic mail to the following parties at the following addresses.

Dated at Portland, Oregon, this 1st day of May, 2014.



Jesse O. Gorsuch

**(W) PUBLIC UTILITY  
COMMISSION OF OREGON**  
RYAN BRACKEN  
P.O. BOX 1088  
SALEM, OR 97308-1088  
ryan.bracken@state.or.us

**(W) PUC STAFF – DEPARTMENT  
OF JUSTICE**  
STEPHANIE S. ANDRUS  
BUSINESS ACTIVITIES SECTION  
1162 COURT ST NE  
SALEM, OR 97301-4796  
stephanie.andrus@state.or.us

**(W) PORTLAND GENERAL  
ELECTRIC**  
CHRISTOPHER A. LIDDLE  
JAY TINKER  
121 SALMON ST – 1WTC-0702  
PORTLAND OR 97204  
christopher.liddle@pgn.com  
pge.opuc.filings@pgn.com

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UE 288**

In the Matter of	)	
	)	
PORTLAND GENERAL ELECTRIC	)	PETITION TO INTERVENE OF THE
COMPANY	)	INDUSTRIAL CUSTOMERS OF
	)	NORTHWEST UTILITIES
	)	
Renewable Resources Adjustment Clause	)	
_____	)	

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

S. Bradley Van Cleve	Bradley G. Mullins
Davison Van Cleve, P.C.	333 S.W. Taylor, Ste. 400
333 S.W. Taylor, Ste. 400	Portland, OR 97204
Portland, OR 97204	E-Mail: brmullins@mwanalytics.com
E-Mail: bvc@dvcclaw.com	Telephone: (503) 954-2852
Telephone: (503) 241-7242	Facsimile: (503) 241-8160
Facsimile: (503) 241-8160	

Tyler C. Pepple  
Davison Van Cleve, P.C.  
333 S.W. Taylor, Ste. 400  
Portland, OR 97204  
E-Mail: tcp@dvclaw.com  
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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 Renewable Resources Adjustment Clause filing (“RAC”). The proposed filing will substantially and directly affect those of ICNU’s members who purchase power from PGE. ICNU requests leave to intervene in this Docket to represent its members who are affected by any change to PGE’s rates as a result of PGE’s proposed adjustments to the RAC.

5. ICNU represents the interests of many of PGE’s largest customers. ICNU has participated in prior PGE general rate cases, including Docket Nos. UE 180, UE 197, UE 215 and UE 262, as well as PGE’s most recent net variable power cost proceedings, Docket Nos. UE 181, UE 198, UE 208, UE 228 and UE 250. 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

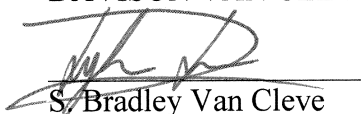
any Commission determination made in connection with these proceedings. It is in the public interest to allow ICNU to intervene in this proceeding.

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

Dated this 1st day of May, 2014.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.



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Of Attorneys for the Industrial Customers of  
Northwest Utilities

**ATTACHMENT A**  
**INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES**

Air Liquide  
Air Products  
Amcor Rigid Plastics  
\*Boeing  
\*Boise Cascade, Inc.  
\*Packaging Corporation of America  
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  
Kapstone Kraft Paper  
\*Linde, Inc.  
Microsoft Corporation  
\*Norpac Foods  
North Pacific Paper Corp  
Northwest Hardwoods  
\*PCC Structurals, Inc.  
Ponderay Newsprint  
PPG Industries Inc.  
REC Solar Grade Silicon LLC  
\*Schnitzer Steel  
Shell Oil Products US  
Simpson Paper & Timber  
\*SP Fiber Technologies  
Tesoro Refining and Marketing Co.  
Timber Products  
Wah Chang  
\*West Linn Paper Company  
Weyerhaeuser

*\*Denotes PGE Customers*