Davison Van Cleve PC

Attorneys at Law

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October 5, 2015

Via Electronic Filing

Public Utility Commission of Oregon Attn: Filing Center 201 High St. SE Salem OR 97301

> In the Matter of PORTLAND GENERAL ELECTRIC CO. Re: Investigation of Advice No. 15-09 Docket No. UE 300

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/ Jesse O. Gorsuch Jesse O. Gorsuch

Enclosure

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UE 300

In the Matter of)	
)	PETITION TO INTERVENE OF THE
PORTLAND GENERAL ELECTRIC)	INDUSTRIAL CUSTOMERS OF
COMPANY)	NORTHWEST UTILITIES
)	
Investigation of Advice No. 15-09.)	
)	

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 at the

following addresses:

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

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 PAGE 1 – PETITION TO INTERVENE OF ICNU

DAVISON VAN CLEVE, P.C. 333 S.W. Taylor, Suite 400 Portland, OR 97204 Telephone: (503) 241-7242 included as Attachment A. Many members of ICNU are customers of Portland General Electric Company ("PGE"), as indicated on Attachment A.

4. This proceeding involves certain costs Portland General Electric Company may incur for relocating facilities, which could ultimately be passed on to its customers, including ICNU's members. ICNU intends to monitor this proceeding and raise issues relevant to the proceeding, as necessary. 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.

5. 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 5th day of October, 2015.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

<u>/s/ Tyler C. Pepple</u> S. Bradley Van Cleve Tyler C. Pepple 333 S.W. Taylor, Suite 400 Portland, Oregon 97204 (503) 241-7242 phone (503) 241-8160 facsimile bvc@dvclaw.com tcp@dvclaw.com Of Attorneys for the Industrial Customers of Northwest Utilities

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DAVISON VAN CLEVE, P.C. 333 S.W. Taylor, Suite 400 Portland, OR 97204 Telephone: (503) 241-7242

ATTACHMENT A

INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

Air Liquide Air Products AkzoNoebel Alcoa **Amcor Rigid Plastics** Axiall, Inc. *Boeing *Boise Cascade, Inc. Certain Teed Gypsum & Ceiling Manufacturing (BPB) **ConAgra** Foods Dyno Nobel, Inc. **Emerald Performance Materials** *Evraz, Inc. Freres Lumber Co. Georgia-Pacific Grant PUD Industries Inland Empire Paper Co. *Intel Corp **International Paper** *JR Simplot Kapstone Kraft Paper *Linde, Inc. Microsoft Corporation *Norpac Foods Northwest Hardwoods *Packaging Corporation of America *PCC Structurals, Inc. Ponderay Newsprint **REC Solar Grade Silicon LLC** RockTenn *Schnitzer Steel Shell Oil Products US *SP Fiber Technologies Tesoro Refining and Marketing Co. **Timber Products** Wah Chang *West Linn Paper Company *Weyerhaeuser