## Davison Van Cleve pc <br> Attorneys at Law

TEL (503) 241-7242 • FAX (503) 241-8160 • jog@dvclaw.com Suite 400
333 SW Taylor
Portland, OR 97204
October 5, 2015

## Via Electronic Filing

Public Utility Commission of Oregon
Attn: Filing Center
201 High St. SE
Salem OR 97301
Re: In the Matter of PORTLAND GENERAL ELECTRIC CO.
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,<br>/s/ Jesse O. Gorsuch<br>Jesse O. Gorsuch

Enclosure

# BEFORE THE PUBLIC UTILITY COMMISSION <br> <br> OF OREGON 

 <br> <br> OF OREGON}

UE 300
In the Matter of )
PORTLAND GENERAL ELECTRIC COMPANY
) PETITION TO INTERVENE OF THE ) INDUSTRIAL CUSTOMERS OF ) 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 | Tyler C. Pepple |
| :--- | :--- |
| Davison Van Cleve, P.C. | 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: bvc@dvclaw.com | E-Mail: tcp@dvclaw.com |
| Telephone: (503) 241-7242 | Telephone: (503) 241-7242 |
| Facsimile: (503) 241-8160 | 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
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.

## /s/ Tyler C. Pepple

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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## ATTACHMENT A

## INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

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

