# Davison Van Cleve PC

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April 6, 2016

Via Electronic Filing

Public Utility Commission of Oregon Attn: Filing Center 201 High St. SE, Suite 100 Salem OR 97301

> In the Matter of PORTLAND GENERAL ELECTRIC CO. Re: 2017 Annual Power Cost Update Tariff **Docket No. UE 308**

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 308**

In the Matter of	)	
	)	PETITION TO INTERVENE OF THE
PORTLAND GENERAL ELECTRIC	)	INDUSTRIAL CUSTOMERS OF
COMPANY	)	NORTHWEST UTILITIES
	)	
2017 Annual Power Cost Update Tariff	)	
	)	

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 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 Bradley G. Mullins 333 S.W. Taylor, Ste. 400 Portland, OR 97204 E-Mail: brmullins@mwanalytics.com Telephone: (503) 954-2852 Facsimile: (503) 241-8160

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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 PGE, as indicated on Attachment A.

4. On April 1, 2016, PGE filed its Annual Power Cost Update Tariff ("AUT"), the purpose of which is to update PGE's net power costs and to establish transition credits or charges for direct access customers. Any adjustment to how such costs are passed along to customers 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.

5. ICNU represents the interests of a number of large electric customers served by PGE in Oregon. ICNU also has significant experience participating in proceedings involving PGE's AUT filings. 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

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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 6th day of April, 2016.

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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## ATTACHMENT A

#### MEMBERS OF INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

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

\*Denotes PGE Customers