# Davison Van Cleve PC

## Attorneys at Law

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February 24, 2017

# Via Electronic Filing

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

Re: In the Matter of PORTLAND GENERAL ELECTRIC CO.

2017 Request for a General Rate Revision

Docket No. UE 319

Dear Filing Center:

Please find enclosed the Petition to Intervene of the Industrial Customers of Northwest Utilities in the above-referenced docket.

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 319**

In the Matter of	)	
	)	PETITION TO INTERVENE OF THE
PORTLAND GENERAL ELECTRIC	)	INDUSTRIAL CUSTOMERS OF
COMPANY	)	NORTHWEST UTILITIES
	)	
Request for a General Rate Revision.	)	
	)	

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 this proceeding should be served on ICNU's attorney and consultant at the following addresses:

Tyler C. Pepple Bradley G. Mullins
Davison Van Cleve, P.C. 333 S.W. Taylor, Ste. 400
Portland, OR 97204

Portland, OR 97204 E-Mail: brmullins@mwanalytics.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 2017 General

Rate Case ("GRC"), which the Company expects to file by the end of this month. The proposed

rate change under the terms of PGE's GRC is likely to 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'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 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.

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

Telephone: (503) 241-7242

# Dated this 24th day of February, 2017.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple
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Of Attorneys for the Industrial Customers of
Northwest Utilities

#### **ATTACHMENT A**

### MEMBERS OF INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

Airgas USA, LLC

Air Liquide

Air Products

AkzoNobel

Alcoa

**Amcor Rigid Plastics** 

Axiall, Inc.

\*Boeing

\*Boise Cascade, LLC

Columbia Steel

ConAgra Foods

\*Darigold

Dyno Nobel, Inc.

Emerald Performance Materials, LLC

\*Evraz, Inc.

Freres Lumber Co.

\*Georgia-Pacific

Inland Empire Paper Co.

\*Intel Corp

\*International Paper

\*J.R. Simplot

Kapstone Kraft Paper

\*Legacy Health

\*Linde, Inc.

Microsoft Corporation

Nippon Dynawave Packaging Co.

\*Norpac Foods

North Pacific Paper Co.

Northwest Hardwoods

\*Packaging Corporation of America

Ponderay Newsprint

**Precision Castparts** 

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

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