# Davison Van Cleve PC

## Attorneys at Law

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April 4, 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 PACIFICORP, dba PACIFIC POWER

2018 Transition Adjustment Mechanism

Docket No. UE 323

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 323**

In the Matter of	)	
	)	PETITION TO INTERVENE OF THE
PACIFICORP, dba PACIFIC POWER	)	INDUSTRIAL CUSTOMERS OF
	)	NORTHWEST UTILITIES
2018 Transition Adjustment Mechanism.	)	

Pursuant to ORS § 756.525 and OAR § 860-001-0300(2), the Industrial Customers of Northwest Utilities ("ICNU") petitions the Public Utility Commission of Oregon ("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 Avenue, #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 independent consultant at the following addresses:

Jesse E. Cowell 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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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

included as Attachment A. Many of ICNU's members are customers of PacifiCorp (or, the

"Company"), as indicated on Attachment A.

4. ICNU has a substantial interest in the PacifiCorp's 2018 Transition

Adjustment Mechanism ("TAM"), which the Company filed with the Commission on March 31,

2017. The outcome of this proceeding may impact the future rates of ICNU members who take

service from PacifiCorp in Oregon. As such, ICNU members stand to be directly and

substantially impacted by the results of this proceeding.

5. ICNU represents the interests of large electric customers served by the

Company in Oregon, and in this capacity routinely participates in proceedings affecting

PacifiCorp's rates and customer service, including recent TAM proceedings. ICNU intends to

address issues that could have a significant impact on future customer rates and service. ICNU's

intervention in this proceeding will assist the Commission in resolving the issues and will not

unreasonably broaden the issues, burden the record, or 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 connected with this proceeding. Accordingly, it is in the public

interest to allow ICNU to intervene 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

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

Dated this 4th day of April, 2017.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Jesse E. Cowell
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Of Attorneys for the Industrial Customers of
Northwest Utilities

### **ATTACHMENT A**

### MEMBERS OF THE 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