# Davison Van Cleve PC

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May 17, 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 2016 Power Cost Adjustment Mechanism Docket No. UE 327

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/ Haley M. Thomas Haley M. Thomas

Enclosure

# **BEFORE THE PUBLIC UTILITY COMMISSION**

#### **OF OREGON**

#### **UE 327**

In the Matter of	)	
	)	PETITION TO INTERVENE OF THE
PACIFICORP, dba PACIFIC POWER,	)	INDUSTRIAL CUSTOMERS OF
	)	NORTHWEST UTILITIES
2016 Power Cost 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 Davison Van Cleve, P.C. 333 S.W. Taylor, Suite 400 Portland, OR 97204 E-Mail: jec@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 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 2016 Power Cost Adjustment Mechanism ("PCAM"), which the Company filed with the Commission on May 15, 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 PCAM and Transition Adjustment Mechanism proceedings associated with PacifiCorp's net power costs. 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 17th day of May, 2017.

Respectfully submitted,

### DAVISON VAN CLEVE, P.C.

<u>/s/ Jesse E. Cowell</u> Jesse E. Cowell 333 S.W. Taylor, Suite 400 Portland, Oregon 97204 (503) 241-7242 jec@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

#### MEMBERS OF THE INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

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 **#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 PacifiCorp Customers