

Davison Van Cleve PC

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January 6, 2014

Via Electronic Mail and Federal Express

Public Utility Commission of Oregon
Attn: Filing Center
3930 Fairview Industrial Dr SE
P.O. Box 1088
Salem OR 97302

Re: PACIFICORP, dba PACIFIC POWER
2015-2019 Renewable Portfolio Standard Implementation Plan
Docket No. UM 1681

Dear Filing Center:

Enclosed for filing in the above-referenced docket, please find the original and one (1) copy of the Petition to Intervene of the Industrial Customers of Northwest Utilities.

Thank you for your assistance, and please do not hesitate to call our office with any questions.

Sincerely,

/s/ Jesse Gorsuch
Jesse Gorsuch

Enclosures

cc: Service List

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the attached PETITION TO INTERVENE OF THE INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES upon all parties in this proceeding, as shown below, by causing the same to be sent via electronic mail only, as all parties have waived paper service.

Dated at Portland, Oregon, this 6th day of January, 2014.

/s/ Jesse Gorsuch
Jesse Gorsuch

<p>(W) PACIFICORP WILLIAM GRIFFITH, SUITE 2000 ETTA LOCKEY, SUITE 1800 825 NE MULTNOMAH ST PORTLAND, OR 97232 bill.griffith@pacificorp.com etta.lockey@pacificorp.com</p>	<p>(W) PUBLIC UTILITY COMMISSION OF OREGON ADAM BLESS P.O. BOX 1088 SALEM, OR 97308-1088 adam.bless@state.or.us</p>
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**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1681

In the Matter of)	
)	
PACIFICORP, dba PACIFIC POWER)	PETITION TO INTERVENE OF THE
)	INDUSTRIAL CUSTOMERS OF
2015-2019 Renewable Portfolio Standard)	NORTHWEST UTILITIES
Implementation Plan)	
_____)	

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 (“OPUC” or the “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 at the following address:

Irion A. Sanger
Davison Van Cleve, P.C.
333 S.W. Taylor, Suite 400
Portland, OR 97204
E-Mail: ias@dvclaw.com
Telephone: (503) 241-7242
Facsimile: (503) 241-816

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, as shown in Attachment A.

4. ICNU has a substantial interest in PacifiCorp's 2015-2019 Renewable Portfolio Standard Implementation Plan ("RPS"), filed on December 26, 2013. The RPS provides information about how PacifiCorp will meet its RPS requirements in the years 2015-2019. ORS 469A requires electric utility companies to develop an implementation plan for meeting the requirements of the standard (at least 15 percent of electricity sold must come from qualifying resources in each of the calendar years 2015 through 2019). PacifiCorp intends to meet its RPS requirements with bundled renewable energy certificates ("RECs") from existing Oregon-allocated eligible renewable resources and from unbundled RECs from Oregon eligible renewable resources. ICNU has a significant interest in PacifiCorp's RPS, since the incremental costs of compliance are expected to rise significantly, and may be included in PacifiCorp's rates paid by ICNU's members.

5. ICNU represents the interests of a number of large electric customers served by PacifiCorp in Oregon. 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 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 January, 2014.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Irion A. Sanger

Irion A. Sanger

Davison Van Cleve, P.C.

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Of Attorneys for the Industrial Customers of Northwest Utilities

ATTACHMENT A

INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

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

**Denotes PacifiCorp Customers*