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January 12, 2015

Via E-Mail and Federal Express

Public Utility Commission of Oregon
Attn: Filing Center
3930 Fairview Industrial Drive SE
Salem OR 97302

Re: PACIFICORP dba PACIFIC POWER
Application for Approval of Deer Creek Mine Transaction
Docket No. UM 1712

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. If you have any questions, please do not hesitate to contact our office.

Sincerely,



Jesse O. 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 sending a copy via electronic mail.

Dated at Portland, Oregon, this 12th day of January, 2015.



Jesse O. Gorsuch

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**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1712

In the Matter of)	
)	
PACIFICORP d/b/a PACIFIC POWER)	PETITION TO INTERVENE OF THE
)	INDUSTRIAL CUSTOMERS OF
Application for Approval of Deer Creek Mine)	NORTHWEST UTILITIES
Transaction.)	
_____)	

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:

Melinda J. Davison	Bradley G. Mullins
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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 shown on Attachment A.

4. ICNU has a substantial interest in PacifiCorp's Application for Approval of Deer Creek Mine Transaction ("Application"), filed on December 12, 2014. Through the Application, PacifiCorp is seeking to recover the Company's Deer Creek Mine closure costs in 2015 and 2016 rates, as well as requesting prudence, deferral, and property transaction determinations. Moreover, the Application could have a significant impact upon PacifiCorp rates: 1) in the near term, given the proposed \$42.6 million, or 3.4% net rate increase estimate; as well as 2) potential long-term impacts via the terms of replacement and amended coal supply agreements ("CSA") for the Huntington and Hunter power plants. In sum, if the Commission grants the Application, it will substantially impact the rates of ICNU's PacifiCorp members.

5. ICNU has extensive experience with proceedings involving PacifiCorp. 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. ICNU intends to participate in this proceeding through review and analysis of all component parts of the Application. The proposed CSA for the Huntington power plant is of special interest to

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ICNU, as CSA terms could limit the Company's future flexibility and potentially add substantial and unnecessary rate costs, should the Company be required to close the plant before the 2029 CSA expiration date. While the Company states broad and favorable termination rights under the Huntington CSA, the potential for long-ranging rate effects warrants careful scrutiny.

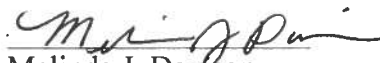
6. As described above, ICNU has a direct and substantial interest in this proceeding that will not be adequately represented by any other party, and may be affected by any Commission determination made in connection with this proceeding. It is in the public interest to allow ICNU to intervene in this proceeding.

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

Dated this 12th day of January, 2015.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.



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Of Attorneys for Industrial Customers
of Northwest Utilities

ATTACHMENT A
INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

Air Liquide
Air Products
Akzo Nobel Pulp and Performance Chemicals, Inc.
Alcoa
Ampcor Rigid Plastics
Axiall, Inc.
Boeing
*Boise Cascade LLC
Certain Teed Gypsum & Ceiling Manufacturing (BPB)
ConAgra Foods
Dyno Nobel, Inc.
Emerald Performance Materials, LLC
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
*Northwest Hardwoods
*Packaging Corporation of America
*PCC Structurals, Inc.
Ponderay Newsprint
REC Solar Grade Silicon LLC
RockTenn
Schnitzer Steel
SP Newsprint
Shell Oil Products US
Simpson Paper & Timber
Tesoro Refining and Marketing Co.
*Wah Chang
West Linn Paper Company
*Weyerhaeuser

**Denotes PacifiCorp Customers*