

Davison Van Cleve PC

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March 31, 2015

Via Electronic Filing

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

Re: OPUC Investigation to Explore Issues Related to a Renewable Generator's
Contribution to Capacity
Docket No. UM 1719

Dear Filing Center:

Enclosed for filing in the above-referenced docket, please find 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,

/s/ Jesse O. Gorsuch
Jesse O. Gorsuch

Enclosure

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1719

In the Matter of)
)
PUBLIC UTILITY COMMISSION OF) PETITION TO INTERVENE OF THE
OREGON) INDUSTRIAL CUSTOMERS OF
) NORTHWEST UTILITIES
)
Investigation to Explore Issues Related to a)
Renewable Generator’s Contribution to)
Capacity)
)

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:

S. Bradley Van Cleve	Bradley G. Mullins
Davison Van Cleve, P.C.	333 S.W. Taylor, Ste. 400
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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 PacifiCorp and Portland General Electric Company (“PGE”), as indicated on Attachment A.

4. The Commission’s investigation in this case may impact the future rates ICNU’s members pay to PacifiCorp and PGE. As such, ICNU’s members stand to be directly and substantially impacted by the results of this investigation.

5. ICNU has significant experience participating in proceedings before the Commission. 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.

Dated this 31st day of March, 2015.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

S. Bradley Van Cleve

Tyler C. Pepple

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Of Attorneys for the Industrial Customers of
Northwest Utilities

ATTACHMENT A

INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

Air Liquide
Air Products
AkzoNobel
Alcoa
Amcor Rigid Plastics
Axiall, Inc.
#*Boeing
#*Boise Cascade, Inc.
Certain Teed Gypsum & Ceiling Manufacturing (BPB)
ConAgra Foods
Dyno Nobel, Inc.
Emerald Performance Materials
*Evraz, Inc.
#Freres Lumber Co.
#*Georgia-Pacific
Grant PUD Industries
Inland Empire Paper Co.
*Intel Corp
#*International Paper
*JR 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
RockTenn
*Schnitzer Steel
Shell Oil Products US
*SP Fiber Technologies
Tesoro Refining and Marketing Co.
#Timber Products
#Wah Chang
*West Linn Paper Company
#Weyerhaeuser

**Denotes PGE Customers*

#Denotes PacifiCorp Customers