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May 12, 2016

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 PORTLAND GENERAL ELECTRIC CO.
Petition for Partial Waiver of Competitive
Bidding Guidelines and Approval of Request for Proposals (RFP) Schedule
Docket No. UM 1773

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 call.

Sincerely,

/s/ Jesse O. Gorsuch
Jesse O. Gorsuch

Enclosure

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1773

In the Matter of)
)
PORTLAND GENERAL ELECTRIC) PETITION TO INTERVENE OF THE
COMPANY) INDUSTRIAL CUSTOMERS OF
) NORTHWEST UTILITIES
)
Petition for Partial Waiver of Competitive)
Bidding Guidelines and Approval of Request for)
Proposals (RFP) Schedule.)

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:

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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 Portland General Electric Company (“PGE”), as indicated on Attachment A.

4. On May 4, 2016, PGE filed a petition for a partial waiver of two of the Commission’s competitive bidding guidelines, along with a request for approval of PGE’s proposed request for proposals (“RFP”) schedule. PGE makes these requests in order to issue a fast-track RFP for renewable energy that would allow the Company to capture the full benefits of the recently extended Renewable Energy Production Tax Credit. The outcome of this proceeding may impact the future rates of those of ICNU’s members who take service from PGE. Accordingly, ICNU requests leave to intervene in this Docket to represent its members who are affected by any change to PGE’s rates.

5. ICNU represents the interests of a number of large electric customers served by PGE in Oregon. 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 12th day of May, 2016.

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
MEMBERS OF INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

Air Liquide
Air Products
AkzoNobel
Alcoa
Amcors Rigid Plastics
Axiell, 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

**Denotes PGE Customers*