Davison Van Cleve PC

Attorneys at Law

TEL (503) 241-7242 • FAX (503) 241-8160 • jog@dvclaw.com Suite 400 333 SW Taylor Portland, OR 97204

June 1, 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.

Application for Deferred Accounting Treatment of Certain Expenses Associated

with an Independent Evaluator for a Renewable Request for Proposals

Docket No. UM 1777

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. Please do not hesitate to call if you have any questions.

Sincerely,

/s/ Jesse O. Gorsuch
Jesse O. Gorsuch

Enclosure

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1777

In the Matter of)
) PETITION TO INTERVENE OF THE
PORTLAND GENERAL ELECTRIC) INDUSTRIAL CUSTOMERS OF
COMPANY) NORTHWEST UTILITIES
)
Application for Deferred Accounting Treatment)
of Certain Expenses Associated with an)
Independent Evaluator for a Renewable Request)
for Proposals.)

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 this proceeding should be served on ICNU's attorney at the following address:

Tyler C. Pepple Davison Van Cleve, P.C. 333 S.W. Taylor, Ste. 400 Portland, OR 97204 E-Mail: tcp@dvclaw.com

Telephone: (503) 241-7242 Facsimile: (503) 241-8160

PAGE 1 – PETITION TO INTERVENE OF ICNU

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 25, 2016, PGE filed an application seeking deferred accounting

treatment of the potential expenses associated with the use of an Independent Evaluator for

PGE's renewable request for proposals. The outcome of this proceeding may impact the future

rates of ICNU 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.

PAGE 2 – PETITION TO INTERVENE OF ICNU

DAVISON VAN CLEVE, P.C. 333 S.W. Taylor, Suite 400 Portland, OR 97204

Dated this 1st day of June, 2016.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple
Tyler C. Pepple
333 S.W. Taylor, Suite 400
Portland, Oregon 97204
(503) 241-7242 phone
(503) 241-8160 facsimile
tcp@dvclaw.com
Of Attorneys for the Industrial Customers of
Northwest Utilities

ATTACHMENT A

MEMBERS OF INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

Air Liquide

Air Products

AkzoNobel

Alcoa

Amcor Rigid Plastics

Axiall, 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