

# Davison Van Cleve PC

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June 7, 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 PACIFICORP, dba PACIFIC POWER  
2015 Renewable Portfolio Standard Compliance Report  
**Docket No. UM 1782**

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 1782**

In the Matter of )  
 )  
PACIFICORP, dba PACIFIC POWER ) PETITION TO INTERVENE OF THE  
 ) INDUSTRIAL CUSTOMERS OF  
 ) NORTHWEST UTILITIES  
2015 Renewable Portfolio Standard )  
Compliance Report. )

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 attorneys at the following addresses:

Tyler C. Pepple  
Davison Van Cleve, P.C.  
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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, as indicated on Attachment A.

4. On June 1, 2016, PacifiCorp filed its 2015 Renewable Portfolio Standard (“RPS”) Compliance Report, which provides information about how PacifiCorp met its 2015 RPS target. The outcome of this proceeding may impact the future rates of ICNU members who take service from PacifiCorp. Accordingly, ICNU requests leave to intervene in this Docket to represent its members who are affected by any change to PacifiCorp’s rates.

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 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 7th day of June, 2016.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

Tyler C. Pepple

Jesse E. Cowell

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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  
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 PacifiCorp Customers*