# Davison Van Cleve PC

Attorneys at Law

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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

#### In the Matter of PORTLAND GENERAL ELECTRIC CO. Re: 2015 Renewable Portfolio Standard Compliance Report Docket No. UM 1783

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 1783

In the Matter of	)	
	)	PETITION TO INTERVENE OF THE
PORTLAND GENERAL ELECTRIC	)	INDUSTRIAL CUSTOMERS OF
COMPANY	)	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. 333 S.W. Taylor, Ste. 400 Portland, OR 97204 E-Mail: tcp@dvclaw.com Telephone: (503) 241-7242 Facsimile: (503) 241-8160 Jesse E. Cowell Davison Van Cleve, P.C. 333 S.W. Taylor, Ste. 400 Portland, OR 97204 E-Mail: jec@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 June 1, 2016, PGE filed its 2015 Renewable Portfolio Standard ("RPS") Compliance Report, which provides information about how PGE met its 2015 RPS target. 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

Dated this 7th day of June, 2016.

Respectfully submitted,

## DAVISON VAN CLEVE, P.C.

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

PAGE 3 – PETITION TO INTERVENE OF ICNU

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#### 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