# Davison Van Cleve PC

## Attorneys at Law

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July 20, 2016

## Via Electronic Filing

Public Utility Commission of Oregon Attn: Filing Center 201 High St. SE, Suite 100 Salem OR 97301

Re: PACIFICORP, dba PACIFIC POWER

2017-2021 Renewable Portfolio Standard Implementation Plan

Docket No. UM 1790

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 1790

In the Matter of	)	
	)	PETITION TO INTERVENE OF THE
PACIFICORP, dba PACIFIC POWER	)	INDUSTRIAL CUSTOMERS OF
	)	NORTHWEST UTILITIES
2017-2021 Renewable Portfolio Standard	)	
Implementation Plan.	)	

Pursuant to ORS § 756.525, the Industrial Customers of Northwest Utilities ("ICNU") hereby petitions the Oregon Public Utility Commission ("Commission") to intervene in this proceeding with full party status such as the Commission is authorized to grant. 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 and consultant at the following addresses:

Jesse E. Cowell

Davison Van Cleve, P.C.

333 S.W. Taylor, Ste. 400

Portland, OR 97204

Portland, OR 97204 E-Mail: brmullins@mwanalytics.com

E-Mail: jec@dvclaw.com Telephone: (503) 954-2852 Telephone: (503) 241-7242 Facsimile: (503) 241-8160

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Tyler C. Pepple

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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 (or the

"Company"), as indicated on Attachment A.

4. Pursuant to Order No. 16-158, PacifiCorp filed its revised 2017-2021

Renewable Portfolio Standard ("RPS") Implementation Plan on July 15, 2016, and updated its

filing on July 20, 2016. The Company's revised RPS plan updates its RPS compliance strategy

in light of new developments, including the recently enacted Senate Bill 1547, that have occurred

since the Company filed its original RPS plan in the fourth quarter of 2015. Under ORS 469A,

electric utility companies must develop an implementation plan for meeting the RPS, which

requires that at least 15 percent of electricity sold must come from qualifying resources in

calendar years 2017-2019, and 20 percent in calendar years 2020-2021. ICNU has a substantial

interest in PacifiCorp's RPS plan, as the costs of compliance could rise significantly, and may be

included in PacifiCorp's rates paid by ICNU's members.

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.

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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 20th day of July, 2016.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Jesse E. Cowell

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Tyler C. Pepple

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Of Attorneys for the Industrial Customers of

Northwest Utilities

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#### ATTACHMENT A

## 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