

# Davison Van Cleve PC

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August 31, 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 Deferral of Incremental Revenue Requirement Associated with  
the Carty Generating Station and Delay of Commission Review of PGE's  
Application until Legal Actions are Resolved.  
**Docket No. UM 1791**

Dear Filing Center:

Please find enclosed the Petition to Intervene of the Industrial Customers of  
Northwest Utilities in the above-referenced docket.

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 1791**

In the Matter of )  
 )  
PORTLAND GENERAL ELECTRIC ) PETITION TO INTERVENE OF THE  
COMPANY, ) INDUSTRIAL CUSTOMERS OF  
 ) NORTHWEST UTILITIES  
Application for Deferral of Incremental )  
Revenue Requirement Associated with the )  
Carty Generating Station and Delay of )  
Commission Review of PGE’s Application until )  
Legal Actions are Resolved. )

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 and consultant at the following addresses:

S. Bradley Van Cleve	Bradley G. Mullins
Davison Van Cleve, P.C.	333 S.W. Taylor, Ste. 400
333 S.W. Taylor, Ste. 400	Portland, OR 97204
Portland, OR 97204	E-Mail: brmullins@mwanalytics.com
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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 Portland General Electric Company (“PGE”), as indicated on Attachment A.

4. On July 29, 2016, PGE filed an application for deferred accounting treatment of the Company’s revenue requirement associated with the Carty Generating Station. 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.

Dated this 31st day of August, 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*