Davison Van Cleve PC

Attorneys at Law

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November 21, 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 PUBLIC UTILITY COMMISSION OF OREGON,

Investigation to Examine PacifiCorp, dba Pacific Power's Non-Standard Avoided

Cost Pricing

Docket No. UM 1802

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,

<u>/s/ Teresa D. Slominski</u> Teresa D. Slominski

Enclosure

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1802

In the Matter of)	
)	PETITION TO INTERVENE OF THE
PUBLIC UTILITY COMMISSION OF)	INDUSTRIAL CUSTOMERS OF
OREGON)	NORTHWEST UTILITIES
)	
Investigation to Examine PacifiCorp, dba)	
Pacific Power's Non-Standard Avoided Cost)	
Pricing.)	

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 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

Bradley G. Mullins

Consultant, Energy & Utilities

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Portland, OR 97204

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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. The Commission's investigation in this case may impact the future rates

ICNU's members pay to PacifiCorp. As such, ICNU's members stand to be directly and

substantially impacted by the results of this investigation.

5. ICNU has significant experience participating in proceedings before the

Commission. 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.

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WHEREFORE, ICNU respectfully requests that the Commission grant its petition to intervene with full party status in this proceeding.

Dated this 21st day of November, 2016.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Jesse E. Cowell
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Of Attorneys for the Industrial Customers of
Northwest Utilities

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