

Davison Van Cleve PC

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June 6, 2017

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.
2016 Renewable Portfolio Standard Compliance Report
Docket No. UM 1847

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 1847

In the Matter of)	
)	
PORTLAND GENERAL ELECTRIC)	PETITION TO INTERVENE OF THE
COMPANY,)	INDUSTRIAL CUSTOMERS OF
)	NORTHWEST UTILITIES
2016 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 attorney and independent consultant 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	Bradley G. Mullins 333 S.W. Taylor, Ste. 400 Portland, OR 97204 E-Mail: brmullins@mwanalytics.com Telephone: (503) 954-2852 Facsimile: (503) 241-8160
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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 June 1, 2017, PGE filed its 2016 Renewable Portfolio Standard Compliance Report (“2016 RPS Report”). ICNU has a substantial interest in the Company’s 2016 RPS Report, as the costs of PGE’s compliance may be included in rates paid by ICNU’s members who purchase power from PGE. Accordingly, ICNU requests leave to intervene in this Docket to represent its members who would be impacted 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 6th day of June, 2017.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

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

Airgas USA, LLC
Air Liquide
Air Products
AkzoNobel
Alcoa
Ampcor Rigid Plastics
Axiall, Inc.
*Boeing
*Boise Cascade, Inc.
Columbia Steel
ConAgra Foods
Darigold
Dyno Nobel, Inc.
Emerald Performance Materials
*Evraz, Inc.
Freres Lumber Co.
Georgia-Pacific
Inland Empire Paper Co.
*Intel Corp
*International Paper
*JR Simplot
Kapstone Kraft Paper
*Legacy Health
*Linde, Inc.
Microsoft Corporation
Nippon Dynawave Packaging Co.
*Norpac Foods
North Pacific Paper Co.
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
Wah Chang
*WestRock
*West Linn Paper Company
Weyerhaeuser

**Denotes PGE Customers*

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