

# Davison Van Cleve PC

Attorneys at Law

TEL (503) 241-7242 • FAX (503) 241-8160 • jog@dvclaw.com  
Suite 400  
333 SW Taylor  
Portland, OR 97204

December 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 PUBLIC UTILITY COMMISSION OF OREGON,  
Investigation of the Scope of the Commission's Authority to Defer Capital Costs  
**Docket No. UM 1909**

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 1909**

In the Matter of )  
 )  
PUBLIC UTILITY COMMISSION OF ) PETITION TO INTERVENE OF THE  
OREGON, ) INDUSTRIAL CUSTOMERS OF  
 ) NORTHWEST UTILITIES  
 )  
Investigation of the Scope of the Commission's )  
Authority to Defer Capital Costs. )

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

Riley G. Peck  
Davison Van Cleve, P.C.  
333 S.W. Taylor, Ste. 400  
Portland, OR 97204  
E-Mail: rgp@dvclaw.com  
Telephone: (503) 241-7242  
Facsimile: (503) 241-8160

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”) and PacifiCorp, as indicated on Attachment A.

4. ICNU has a substantial interest in the outcome of the Commission’s investigation into its legal authority to defer a utility’s capital costs for later inclusion in rates. Any deferral of such costs may impact the rates paid by those of ICNU’s members who purchase power from PGE and PacifiCorp. ICNU therefore requests leave to intervene in this Docket to represent its members who are affected by any change to PGE’s and PacifiCorp’s rates.

5. ICNU represents the interests of a number of large electric customers served by PGE and 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.

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 December, 2017.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

Tyler C. Pepple

Riley G. Peck

333 S.W. Taylor, Suite 400

Portland, Oregon 97204

(503) 241-7242 (phone)

(503) 241-8160 (facsimile)

tcp@dvclaw.com

rgp@dvclaw.com

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  
\*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  
Lamb Weston  
#\*Legacy Health  
\*Linde, Inc.  
Microsoft Corporation  
Nippon Dynawave Packaging Co.  
#\*Norpac Foods  
North Pacific Paper Co.  
#Northwest Hardwoods  
\*Packaging Corporation of America  
Ponderay Newsprint  
#\*Precision Castparts Co.  
REC Solar Grade Silicon LLC  
\*Schnitzer Steel  
Shell Oil Products US  
Solvay Chemicals  
Tesoro Refining and Marketing Co.  
Timber Products  
#Wah Chang  
\*WestRock  
#Weyerhaeuser NR Co.

*\*Denotes PGE Customers*

*#Denotes PacifiCorp Customers*