# Davison Van Cleve PC

# Attorneys at Law

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January 15, 2018

## Via Electronic Filing

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

> In the Matter of PORTLAND GENERAL ELECTRIC COMPANY Re:

Application for Authorization to Defer Benefits Associated with the US

Tax Reconciliation Act Docket No. UM 1920

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/ Haley M. Thomas Haley M. Thomas

#### BEFORE THE PUBLIC UTILITY COMMISSION

## **OF OREGON**

#### **UM 1920**

In the Matter of	)	
	)	PETITION TO INTERVENE OF THE
PORTLAND GENERAL ELECTRIC	)	INDUSTRIAL CUSTOMERS OF
COMPANY,	)	NORTHWEST UTILITIES
	)	
Application for Deferred Accounting Benefits	)	
Associated with the U.S. Tax Reconciliation	)	
Act.	)	

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 independent consultant at the following addresses:

Tyler C. Pepple

Davison Van Cleve, P.C.

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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. ICNU has a substantial interest in the outcome of PGE's application for

deferred accounting related to the Federal Tax Act signed into law on December 22, 2017. Any

deferral of such costs may impact the rates paid by those of ICNU's members who purchase

power from PGE. ICNU therefore 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.

As described above, ICNU has a direct and substantial interest in this 6.

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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DAVISON VAN CLEVE, P.C. 333 S.W. Taylor, Suite 400 Portland, OR 97204

Telephone: (503) 241-7242

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

Dated this 15th day of January, 2018.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple
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Of Attorneys for the Industrial Customers of
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#### ATTACHMENT A

#### MEMBERS OF INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

Airgas USA, LLC

Air Liquide

Air Products

AkzoNobel

Alcoa

**Amcor Rigid Plastics** 

Axiall, Inc.

\*Boeing

\*Boise Cascade, LLC

Columbia Steel

\*Darigold

Dyno Nobel, Inc.

Emerald Performance Materials, LLC

Evraz, Inc.

\*Freres Lumber Co.

Georgia-Pacific

Inland Empire Paper Co.

\*Intel Corp

\*International Paper

\*J.R. Simplot

Kapstone Kraft Paper

Lamb Weston

\*Legacy Health

\*Linde, Inc.

Microsoft Corporation

Nippon Dynawave

\*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

**Solvay Chemicals** 

Tesoro Refining and Marketing Co.

Timber Products, Inc.

Wah Chang

\*WestRock

\*West Linn Paper Company

Weyerhaeuser

<sup>\*</sup>Denotes PGE Customers