Davison Van Cleve PC

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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 PUBLIC UTILITY COMMISSION OF OREGON Re: Application to Defer Changes in PacifiCorp's Federal Tax Obligations Resulting from H.R.1 – Tax Cuts and Jobs Act Docket No. UM 1925

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 1925

In the Matter of)
STAFF OF THE PUBLIC UTILITY)
COMMISSION OF OREGON,)
Application to Defen Changes in DesifiCarry')
Application to Defer Changes in PacifiCorp' Federal Tax Obligations Resulting from H.R	,
– Tax Cuts and Jobs Act.)

PETITION TO INTERVENE OF THE INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

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. 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

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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

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. ICNU has a substantial interest in the outcome of PacifiCorp'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 PacifiCorp. ICNU therefore requests leave to intervene in this Docket to represent its members who are affected by any change to PacifiCorp's rates.

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

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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 15th day of January, 2018.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

<u>/s/Tyler C. Pepple</u> 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

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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, 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 PacifiCorp Customers