

Davison Van Cleve PC

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March 19, 2018

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.
2018 Request for Proposals for Renewable Resources
Docket No. UM 1934

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/ Haley M. Thomas
Haley M. Thomas

Enclosure

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1934

In the Matter of)
)
PORTLAND GENERAL ELECTRIC) PETITION TO INTERVENE OF THE
COMPANY) INDUSTRIAL CUSTOMERS OF
) NORTHWEST UTILITIES
)
2018 Request for Proposals for Renewable)
Resources.)
)
_____)

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 consultant at the following addresses:

Tyler C. Pepple	Bradley G. Mullins
Davison Van Cleve, P.C.	1750 SW Harbor Way, Suite 450
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Portland, OR 97201	E-Mail: brmullins@mwanalytics.com
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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 2018 Request for Proposals (“RFP”) for Renewable Resources, which the Company filed on March 9, 2018. Through its 2018 RFP, the Company is seeking up to 100 average megawatts of renewable energy, bundled with associated renewable energy credits. The outcome of this RFP process could have significant and direct impacts on ICNU member rates. Accordingly, ICNU 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.

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 19th day of March, 2018.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

Tyler C. Pepple

Riley G. Peck

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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
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
*Oregon Health Sciences University
*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
*West Linn Paper Company
Weyerhaeuser NR Co.

**Denotes PGE Customers*