BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1505

In the Matter of)
PUBLIC UTILITY COMMISSION OF) PETITION TO INTERVENE OF THE) INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES
OREGON) NORTHWEST UTILITIES
Solar Photovoltaic Program Draft Report	
Comments and Recommendations	_)

Pursuant to ORS § 756.525 and OAR § 860-012-0001, the Industrial Customers of Northwest Utilities ("ICNU") petitions the Public Utility Commission of Oregon ("Commission") to intervene in this proceeding with full party status as described in OAR § 860-011-0035(5). ICNU waives paper service of all non-confidential filings. In support of this petition, ICNU represents as follows:

1. The business address of ICNU is:

Michael Early Industrial Customers of Northwest Utilities 333 S.W. Taylor, Suite 400 Portland, OR 97204

2. ICNU will be represented in this proceeding by Davison Van Cleve P.C. All documents relating to these proceedings should be served on ICNU and ICNU's attorneys at the following addresses:

Melinda J. Davison Jocelyn C. Pease Davison Van Cleve, P.C. 333 S.W. Taylor, Suite 400 Portland, OR 97204 E-Mail: mjd@dvclaw.com

jcp@dvclaw.com Telephone: (503) 241-7242 Facsimile: (503) 241-8160 Michael B. Early Executive Director Industrial Customers of Northwest Utilities 1300 SW 5th Ave Suite 1750 Portland, OR 97201

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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.
- 4. ICNU has a substantial interest in the Public Utility Commission of Oregon's ("OPUC" or the "Commission") Solar Photovoltaic Program Draft Report Comments and Recommendations ("Report") proceeding which could impact industrial customer rates.
- 5. ICNU has appeared in numerous dockets related to renewable energy, and has been actively involved in many general rate cases. As a result, ICNU has knowledge and expertise that may assist the Commission in resolving the issues in the proceeding. ICNU's intervention in this proceeding will not unreasonably broaden the issues, burden the record, or 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 these proceedings. 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 14th day of October, 2010.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

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Of Attorneys for Industrial Customers

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