

# Davison Van Cleve PC

Attorneys at Law

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

August 28, 2012

*Via Electronic and US Mail*

Public Utility Commission  
Attn: Filing Center  
550 Capitol St. NE #215  
P.O. Box 2148  
Salem OR 97308-2148

Re: In the Matter of PORTLAND GENERAL ELECTRIC Application for  
Deferral Accounting of Excess Pension Costs and Carrying Costs on Cash  
Contributions  
**Docket No. UM 1623**

Dear Filing Center:

Enclosed please find the original and one (1) copy of the Petition to Intervene on  
behalf of the Industrial Customers of Northwest Utilities in the above-referenced docket.

Thank you for your assistance.

Sincerely,

/s/ Sarah A. Kohler  
Sarah A. Kohler

Enclosures

cc: Service List

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have this day served the foregoing Petition to Intervene on behalf of the Industrial Customers of Northwest Utilities upon the parties, on the service list, by causing the same to be deposited in the U.S. Mail, postage-prepaid, and via electronic mail.

Dated at Portland, Oregon, this 28th day of August, 2012.

Sincerely,

/s/ Sarah A. Kohler  
Sarah A. Kohler

**(W) PORTLAND GENERAL ELECTRIC**

Patrick Hager – 1WTC0702  
Douglas C. Tingey – 1WTC1301  
Christopher A. Liddle  
121 SW Salmon St.  
Portland, OR 97204  
pge.opuc.filings@pgn.com  
doug.tingey@pgn.com  
christopher.liddle@pgn.com

**PUC STAFF – DEPARTMENT OF JUSTICE**

Jason W. Jones  
BUSINESS ACTIVITIES SECTION  
1162 COURT ST NE  
SALEM OR 97301-4096  
jason.w.jones@state.or.us

**(W) CITIZENS' UTILITY BOARD OF OREGON**

OPUC Dockets  
Robert Jenks  
G. Catriona McCracken  
610 SW BROADWAY, STE 400  
PORTLAND OR 97205  
dockets@oregoncub.org  
bob@oregoncub.org  
catriona@oregoncub.org

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1623**

In the Matter of	)	
	)	
PORTLAND GENERAL ELECTRIC	)	PETITION TO INTERVENE OF THE
	)	INDUSTRIAL CUSTOMERS OF
Application for Deferral Accounting of Excess)	)	NORTHWEST UTILITIES
Pension Costs and Carrying Costs on Cash	)	
<u>Contributions</u>	)	

Pursuant to ORS § 756.525 and OAR § 860-001-0300(2), 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 § 860-001-0010(7). 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:  
  
Industrial Customers of Northwest Utilities  
818 SW 3rd Avenue, #266  
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’s attorneys and consultant at the following address:

S. Bradley Van Cleve  
Irion A. Sanger  
Davison Van Cleve, P.C.  
333 S.W. Taylor, Suite 400  
Portland, OR 97204  
E-Mail: [bvc@dvclaw.com](mailto:bvc@dvclaw.com)  
[ias@dvclaw.com](mailto:ias@dvclaw.com)  
Telephone: (503) 241-7242  
Facsimile: (503) 241-8160

Donald W. Schoenbeck  
Regulatory & Cogeneration  
Services, Inc.  
900 Washington Street, Suite 780  
Vancouver, WA 98660  
E-Mail: [dws@r-c-s-inc.com](mailto:dws@r-c-s-inc.com)  
Telephone: (503) 232-6155  
Facsimile: (360) 737-7628

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 of ICNU's members are customers of Portland General Electric Company ("PGE"), as shown on Attachment A.

4. On August 22, 2012, PGE filed an application with the Commission for an order approving the deferral of FAS 87 pension costs and carrying costs on cash contributions ("Application") in excess of the test year amount established in UE 215, its 2011 general rate case. The deferred amounts, which total approximately at \$12.9 million for 2012, would not immediately affect a change in PGE's rates; however, they would potentially be allowed in a subsequent proceeding. ICNU opposes the deferral and requests leave to intervene in this Docket to represent its members who would be affected by the deferral of PGE's costs.

5. ICNU has extensive experience with proceedings involving PGE's rates, including UE 208, UE 215, UE 228, and UE 250. ICNU's intervention in this proceeding will assist the Commission in resolving the issues and 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. Therefore, 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 28th day of August, 2012.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Irion A. Sanger

S. Bradley Van Cleve

Irion A. Sanger

333 S.W. Taylor, Suite 400

Portland, Oregon 97204

(503) 241-7242 phone

(503) 241-8160 facsimile

bvc@dvclaw.com

ias@dvclaw.com

Of Attorneys for Industrial Customers  
of Northwest Utilities

**ATTACHMENT A**  
**INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES**

Air Liquide  
Air Products  
Ampcor Rigid Plastics  
Certain Teed Gypsum & Ceiling Manufacturing, Inc. (BPB)  
Boeing\*\*  
Boise Cascade LLC  
Boise Paper\*\*  
ConAgra Foods  
D R Johnson Lumber Company  
Dyno Nobel, Inc.  
Eka Chemicals, Inc.  
Emerald Performance Materials, LLC  
Equa-Chlor, LLC  
Evraz, Inc.\*\*  
Freres Lumber Co.  
Georgia-Pacific  
Grays Harbor Paper, L.P.  
Inland Empire Paper Co.  
Intel\*\*  
International Paper  
JR Simplot\*\*  
Linde, Inc.\*\*  
Longview Fibre  
Microsoft Corporation  
Norpac Foods\*\*  
PCC Structurals, Inc\*\*  
REC Solar Grade Silicon LLC  
SP Newsprint\*\*  
Shell Oil Products US  
Simpson Paper & Timber  
Tesoro Refining and Marketing Co.  
Wah Chang  
West Linn Paper Company\*\*  
Weyerhaeuser

*\*\*Denotes PGE Customers*