

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1662

In the Matter of)	
)	
PORTLAND GENERAL ELECTRIC)	PETITION TO INTERVENE OF THE
COMPANY and PACIFICORP d/b/a PACIFIC)	INDUSTRIAL CUSTOMERS OF
POWER)	NORTHWEST UTILITIES
)	
Request for Generic Power Cost Adjustment)	
Mechanism Investigation.)	
_____)	

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 these proceedings should be served on ICNU’s attorneys and consultant at the following addresses:

S. Bradley Van Cleve Davison Van Cleve, P.C. 333 S.W. Taylor, Ste. 400 Portland, OR 97204 E-Mail: bvc@dvclaw.com Telephone: (503) 241-7242 Facsimile: (503) 241-8160	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
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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 PacifiCorp and Portland General Electric Company (“PGE”), as indicated on Attachment A.

4. On June 19, 2013, PacifiCorp and PGE (the “Companies”) filed a request for a generic investigation into the power cost adjustment mechanisms (“PCAMs”) currently in place for the two Companies. Following discussions with interested parties, including ICNU, the Companies filed another request on March 21, 2014, which asked the Commission to narrow its investigation to the issue of the recovery of costs incurred by the Companies to comply with Oregon’s Renewable Portfolio Standard (“RPS”). Any adjustment to how such costs are recovered will substantially and directly affect those of ICNU’s members who purchase power from PGE and PacifiCorp. ICNU requests leave to intervene in this Docket to represent its members who are affected by any change to PGE’s and PacifiCorp’s rates.

5. ICNU opposes the Commission opening an investigation into the Companies’ PCAMs. The Commission recently adopted a PCAM for PacifiCorp and rejected PacifiCorp’s argument that the RPS justifies a change in the standard Oregon PCAM.

6. ICNU represents the interests of a number of large electric customers served by PacifiCorp and PGE in Oregon. ICNU has significant experience participating in

proceedings involving the PCAMs of PGE and PacifiCorp. 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.

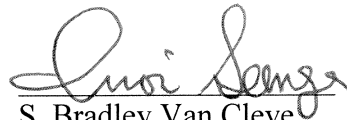
7. As described above, ICNU has a direct and substantial interest in this proceeding that will not be adequately represented by any other party, and may be affected by any Commission determination made in connection with this proceeding. It is in the public interest to allow ICNU to intervene in this proceeding.

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

Dated this 28th day of March, 2014.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.



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Of Attorneys for the Industrial Customers of
Northwest Utilities

ATTACHMENT A

INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

Air Liquide
Air Products
AkzoNoebel
Amcor Rigid Plastics
Axiall, Inc.
*Boeing
#*Boise Cascade, Inc.
*Packaging Corporation of America
Certain Teed Gypsum & Ceiling Manufacturing (BPB)
ConAgra Foods
Dyno Nobel, Inc.
Eka Chemicals, Inc.
Emerald Performance Materials
*Evraz, Inc.
#Freres Lumber Co.
*Georgia-Pacific
Inland Empire Paper Co.
*Intel Corp
*International Paper
*JR Simplot
Kapstone Kraft Paper
*Linde, Inc.
Microsoft Corporation
#*Norpac Foods
#Northwest Hardwoods
#*PCC Structurals, Inc.
Ponderay Newsprint
PPG Industries Inc.
REC Solar Grade Silicon LLC
*Schnitzer Steel
Shell Oil Products US
Simpson Paper & Timber
*SP Fiber Technologies
Tesoro Refining and Marketing Co.
#Timber Products
#Wah Chang
*West Linn Paper Company
#Weyerhaeuser

**Denotes PGE Customers*

#Denotes PacifiCorp Customers

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March 28, 2014

Via E-Mail and Federal Express

Public Utility Commission of Oregon
Attn: Filing Center
3930 Fairview Industrial Drive SE
Salem OR 97302

Re: PORTLAND GENERAL ELECTRIC and PACIFICORP dba PACIFIC POWER
Request for a Generic Power Cost Adjustment Mechanism Investigation
Docket No. UM 1662

Dear Filing Center:

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

Thank you for your assistance, and please do not hesitate to call our office with any questions.

Sincerely,



Jesse O. Gorsuch

Enclosures

cc: Service List

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the attached **Petition to Intervene of the Industrial Customers of Northwest Utilities** upon all parties in this proceeding by sending a copy via electronic mail to the following parties at the following addresses.

Dated at Portland, Oregon, this 28th day of March, 2014.



Jesse O. Gorsuch

(W) CITIZENS' UTILITY BOARD OF OREGON

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(W) PUBLIC UTILITY COMMISSION OF OREGON

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