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January 8, 2016

Via Electronic Filing

Public Utility Commission of Oregon
Attn: Filing Center
201 High St. SE, Suite 100
Salem OR 97301

Re: PORTLAND GENERAL ELECTRIC COMPANY
2017-2021 Renewable Portfolio Standard Implementation Plan
Docket No. UM 1755

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/ Jesse O. Gorsuch
Jesse O. Gorsuch

Enclosure

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1755

In the Matter of)
)
PORTLAND GENERAL ELECTRIC) PETITION TO INTERVENE OF THE
COMPANY) INDUSTRIAL CUSTOMERS OF
) NORTHWEST UTILITIES
)
2017-2021 Renewable Portfolio Standard)
Implementation Plan.)

Pursuant to ORS § 756.525, the Industrial Customers of Northwest Utilities (“ICNU”) hereby petitions the Oregon Public Utility Commission (“Commission”) to intervene in this proceeding with full party status such as the Commission is authorized to grant. 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:

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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 (“PGE” or the “Company”), as shown on Attachment A.

4. PGE filed its 2016 Renewable Portfolio Standard (“RPS”) Implementation Plan on December 31, 2015. The Company’s RPS plan details how PGE intends to meet its RPS requirements in the years 2017-2021. Under ORS 469A, electric utility companies must develop an implementation plan for meeting the RPS, which requires that at least 15 percent of electricity sold must come from qualifying resources in calendar years 2017-2019, and 20 percent in calendar years 2020-2021. PGE intends to meet its RPS obligations during these years primarily with bundled renewable energy certificates from existing Oregon-eligible resources. ICNU has a substantial interest in PGE’s RPS plan, as the costs of compliance could rise significantly, and may be included in PGE’s rates paid by ICNU’s members.

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 8th day of January, 2016.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

Tyler C. Pepple

Jesse E. Cowell

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Of Attorneys for the Industrial Customers of
Northwest Utilities

ATTACHMENT A

INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

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

**Denotes PGE Customers*