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May 2, 2016

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 the Northwest and Intermountain Power Producers Coalition
Petition for Temporary Rulemaking and Investigation into PacifiCorp's
2016 Requests for Proposal
Docket No. UM 1771

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 1771

In the Matter of)
)
The Northwest and Intermountain Power) PETITION TO INTERVENE OF THE
Producers Coalition) INDUSTRIAL CUSTOMERS OF
) NORTHWEST UTILITIES
)
Petition for Temporary Rulemaking and)
Investigation into PacifiCorp’s 2016 Requests)
for Proposal)
)

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:

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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, as indicated on Attachment A.

4. On April 25, 2016, the Northwest and Intermountain Power Producers Coalition (“NIPPC”) filed a petition for a temporary rulemaking, docketed as AR 598, along with a request to open an investigation into PacifiCorp’s 2016 requests for proposal (“2016 RFPs”) in connection with renewable energy and renewable energy certificates, docketed as UM 1771. ICNU has a substantial interest in these proceedings, as PacifiCorp’s 2016 RFPs may directly affect those of ICNU’s members who purchase power from PacifiCorp. Concurrently with this Petition, ICNU is filing comments on NIPPC’s petition that more fully describes ICNU’s interest in this proceeding. ICNU requests leave to intervene in this Docket to represent its members who are affected by any change to PacifiCorp’s rates.

5. ICNU represents the interests of a number of large electric customers served by PacifiCorp 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.

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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 2nd day of May, 2016.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

Tyler C. Pepple

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Of Attorneys for the Industrial Customers of
Northwest Utilities

ATTACHMENT A
MEMBERS OF INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

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

#Denotes PacifiCorp Customers