

# Davison Van Cleve PC

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January 9, 2017

## *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 PACIFICORP, dba PACIFIC POWER,  
Application for Transportation Electrification Public Charging Pilot Program  
**Docket No. UM 1813**

Dear Filing Center:

Please find enclosed the Petition to Intervene of the Industrial Customers of Northwest Utilities in the above-referenced docket.

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 1813**

In the Matter of )  
 )  
PACIFICORP, dba PACIFIC POWER ) PETITION TO INTERVENE OF THE  
 ) INDUSTRIAL CUSTOMERS OF  
Application for Transportation Electrification ) NORTHWEST UTILITIES  
Public Charging Pilot Program. )  
\_\_\_\_\_ )

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). 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 attorney staff and independent 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 of ICNU's members are customers of PacifiCorp (or, the "Company"), as indicated on Attachment A.

4. ICNU has a substantial interest in the Company's proposed Transportation Electrification Public Charging Pilot Program. Costs associated with the proposed program may have a direct bearing on ICNU member rates. Moreover, the Company's proposal could require the addition of significant new utility-owned infrastructure in the PacifiCorp service area that may potentially alter customer demand, thereby further affecting rates. The outcome of this proceeding may impact the future rates of those of ICNU's members who take service from PacifiCorp. Accordingly, ICNU requests leave to intervene in this Docket to represent its members who are affected by any change to PacifiCorp's rates and customer service.

5. ICNU represents the interests of a number of large electric customers served by the Company in Oregon, and in this capacity routinely participates in proceedings affecting PacifiCorp's rates and customer service. ICNU intends to address issues that could have a significant impact on future customer rates and service. 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 connected 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 9th day of January, 2017.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Jesse E. Cowell

Jesse E. Cowell

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Of Attorneys for the Industrial Customers of  
Northwest Utilities

**ATTACHMENT A**  
**MEMBERS OF THE 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*