#### BEFORE THE PUBLIC UTILITY COMMISSION

### **OF OREGON**

I.C 47

	LC 47	
In the Matter of	)	
	)	PETITION TO INTERVENE OF THE
PACIFICORP	)	INDUSTRIAL CUSTOMERS OF
	)	NORTHWEST UTILITIES
2008 Integrated Resource Plan.	)	
	)	

Pursuant to ORS § 756.525 and OAR § 860-012-0001, the Industrial Customers of Northwest Utilities ("ICNU") petitions the Public Utility Commission of Oregon ("OPUC" or the "Commission") to intervene in this proceeding with full party status as described in OAR § 860-011-0035(5). In support of this petition, ICNU represents as follows:

1. The business address of ICNU is:

Michael Early Industrial Customers of Northwest Utilities 333 SW Taylor Street Suite 400 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 and executive director at the following addresses:

Irion Sanger Michael Early

Davison Van Cleve, P.C. Industrial Customers of Northwest Utilities

333 S.W. Taylor, Suite 400 333 SW Taylor Street

Portland, OR 97204 Suite 400

E-Mail: mail@dvclaw.com Portland, OR 97204

Telephone: (503) 241-7242 E-Mail: mearly@icnu.org

Facsimile: (503) 241-8160 Telephone: (503) 503-239-9269

Facsimile: (503) 503-402-8882

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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, as shown in

Attachment A.

4. ICNU has a substantial interest in PacifiCorp's 2008 Integrated Resource

Plan ("IRP"). Any Commission decision regarding PacifiCorp's 2008 IRP could have an impact

on the rates and quality of service that PacifiCorp provides to ICNU's members.

5. ICNU represents the interests of a number of large electric customers in

the State of Oregon. ICNU has participated in previous least cost proceedings before the

Commission, such as PacifiCorp's Resource and Market Planning Program, which was docketed

as LC 31. 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 this proceeding. It is in the public

interest to allow ICNU to intervene in this proceeding.

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DAVISON VAN CLEVE, P.C. 333 S.W. Taylor, Suite 400 Portland, OR 97204 Telephone: (503) 241-7242

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

Dated this 30th day of June, 2009.

Respectfully submitted,

of Northwest Utilities

DAVISON VAN CLEVE, P.C.

/s/ Irion Sanger
Irion Sanger
Davison Van Cleve, P.C.
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Of Attorneys for Industrial Customers

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### ATTACHMENT A INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

Air Liquide

Air Products

Amcor PET Packaging USA, Inc. (CNC Containers Northwest)

Certain Teed Gypsum & Ceiling Manufacturing, Inc. (BPB)

Blue Heron Paper Company

Boeing

\*Boise Cascade LLC

\*Boise Paper

\*ConAgra Foods

Dyno Nobel, Inc.

Eka Chemicals, Inc.

Emerald Performance Materials, LLC

Equa-Chlor, LLC

\*Evanite Fiber

Evraz Oregon Steel Mills

\*Freres Lumber Company

\*Georgia-Pacific

Grays Harbor Paper, L.P.

\*Hewlett-Packard

Inland Empire Paper Co.

Intel

\*International Paper

J.R. Simplot

Kimberly-Clark Corporation

Linde, Inc.

Longview Fibre

Microsoft Corporation

\*Norpac Foods

PCC Structurals, Inc.

Ponderay Newsprint

REC Solar Grade Silicon LLC

Shell Oil Products US

Simpson Paper & Timber

SP Newsprint

Tesoro Refining and Marketing Co.

\*Wah Chang

West Linn Paper Company

\*Weyerhaeuser

<sup>\*</sup>Denotes PacifiCorp Customers

## 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

June 30, 2009

### Via Electronic and U.S. Mail

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

> In the Matter of PACIFICORP's 2008 Integrated Resource Plan. Re:

> > Docket No. LC 47

Dear Filing Center:

Enclosed please find the original Petition to Intervene on behalf of the Industrial Customers of Northwest Utilities in the above-referenced docket.

Thank you for your assistance.

Sincerely,

/s/ Allison M. Wils Allison M. Wils

Enclosures

Service List cc:

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have this day served the foregoing Petition to

Intervene on behalf of the 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 30th day of June, 2009.

Sincerely,

/s/ Allison M. Wils
Allison M. Wils

OREGON DEPARTMENT OF ENERGY VIJAY A SATYAL 625 MARION ST NE SALEM OR 97301 vijay.a.satyal@state.or.us	DEPARTMENT OF JUSTICE MICHAEL T WEIRICH REGULATED UTILITY & BUSINESS SECTION 1162 COURT ST NE SALEM OR 97301-4096 michael.weirich@doj.state.or.us
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