

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

March 28, 2011

Via Electronic and US Mail

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

Re: In the Matter of PACIFICORP 2012 Transition Adjustment Mechanism
Docket No. UE 227

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/ Sarah A. Kohler
Sarah A. Kohler

Enclosures

cc: Service List

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 28th day of March, 2011.

Sincerely,

/s/ Sarah A. Kohler

Sarah A. Kohler

(W) PACIFIC POWER & LIGHT
JORDAN A WHITE
SENIOR COUNSEL
825 NE MULTNOMAH STE 1800
PORTLAND OR 97232
jordan.white@pacificorp.com

(W) PACIFICORP
OREGON DOCKETS
825 NE MULTNOMAH ST STE 2000
PORTLAND OR 97232
oregondockets@pacificorp.com

(W) MCDOWELL & RACKNER PC
KATHERINE A MCDOWELL
520 SW SIXTH AVE - SUITE 830
PORTLAND OR 97204
katherine@mcd-law.com

PUBLIC UTILITY COMMISSION OF OREGON
KELCEY BROWN
PO BOX 2148
SALEM OR 97301
kelcey.brown@state.or.us

(W) CITIZENS' UTILITY BOARD OF OREGON
GORDON FEIGHNER
ROBERT JENKS
G. CATRIONA MCCrackEN
610 SW BROADWAY, STE 400
PORTLAND OR 97205
gordon@oregoncub.org
bob@oregoncub.org
catriona@oregon.org

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 227

In the Matter of)	
)	
PACIFICORP, dba PACIFIC POWER)	PETITION TO INTERVENE OF THE
)	INDUSTRIAL CUSTOMERS OF
2012 Transition Adjustment Mechanism)	NORTHWEST UTILITIES
Schedule 201, Net Power Costs, Cost-Based)	
Supply Service)	
Schedule 205, TAM Adjustment for Other)	
Revenues)	

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). ICNU waives paper service of all non-confidential filings. In support of this petition, ICNU represents as follows:

1. The business address of ICNU is:

Michael Early
Industrial Customers of Northwest Utilities
1300 SW 5th Ave, Suite 1750
Portland, OR 97201

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 address:

Irion Sanger
Davison Van Cleve, P.C.
333 S.W. Taylor, Suite 400
Portland, OR 97204
E-Mail: ias@dvclaw.com
mail@dvclaw.com
Telephone: (503) 241-7242
Facsimile: (503) 241-8160

Donald W. Schoenbeck
Regulatory & Cogeneration
Services, Inc.
900 Washington Street, Suite 780
Vancouver, WA 98660
E-Mail: dws@r-c-s-inc.com
Telephone: (503) 232-6155
Facsimile: (360) 737-7628

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 shown on Attachment A.

4. ICNU has a substantial interest in PacifiCorp's Application for its 2012 Transition Adjustment Mechanism ("Application"). PacifiCorp filed its Application on March 17, 2011. The transition adjustment indicates that PacifiCorp's net power costs ("NPC") have increased by \$79 million. As a result of this increase, the Company proposes to increase the rates that PacifiCorp provides to ICNU's members that remain on cost of service rates by \$61.6 million, with rate increases between 6-8%.

5. ICNU has extensive experience with PacifiCorp's rates and ICNU has participated in all of the previous transition adjustment mechanism cases. 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 these proceedings. It is in the public interest to allow ICNU to intervene in this proceeding.

PAGE 2 – PETITION TO INTERVENE OF ICNU

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, 2011.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Irion A. Sanger

Irion Sanger

333 S.W. Taylor, Suite 400

Portland, Oregon 97204

(503) 241-7242 phone

(503) 241-8160 facsimile

ias@dvclaw.com

Of Attorneys for Industrial Customers
of Northwest Utilities

ATTACHMENT A
INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

Air Liquide
Air Products
Amcor PET Packaging USA, Inc.
Certain Teed Gypsum & Ceiling Manufacturing (BPB)
Blue Heron Paper Company
Boeing
*Boise Cascade LLC
*Boise Paper
*ConAgra Foods
Dyno Nobel, Inc.
Eka Chemicals, Inc.
Emerald Kalama Chemical, LLC
Equa-Chlor, LLC
Evraz, Inc.
*Freres Lumber Co.
*Georgia-Pacific
Grays Harbor Paper, L.P.
*Hewlett-Packard
Inland Empire Paper Co.
Intel
Kimberly-Clark Corporation
Linde, Inc.
Longview Fibre
Microsoft Corporation
*Norpac Foods
PCC Structurals, Inc.
REC Solar Grade Silicon LLC
SP Newsprint
Shell Oil Products US
Simpson Paper & Timber
Tesoro Refining and Marketing Co.
Treetop Inc.
*Wah Chang
West Linn Paper Company
*Weyerhaeuser

**Denotes PacifiCorp Customers*