# Davison Van Cleve PC

### Attorneys at Law

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January 23, 2008

## 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, dba PACIFIC POWER Application for Re:

approval of a solicitation process for flexible resources starting in 2012

through 2017

Docket No. UM 1360

Dear Filing Center:

Enclosed please find the original and one (1) copy of the Petition to Intervene of the Industrial Customers of Northwest Utilities in the above-referenced matter.

Thank you for your assistance.

Sincerely yours,

/s/ Eric G. Shelton Eric G. Shelton

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 Industrial Customers of Northwest Utilities upon the parties, shown below, on the official service list by causing the foregoing document to be deposited, postage-prepaid, in the U.S. Mail, or by service via electronic mail to those parties who have waived paper service.

Dated at Portland, Oregon, this 23rd day of January, 2008.

/s/ Eric G. Shelton Eric G. Shelton

PACIFIC POWER OREGON DOCKETS 825 NE MULTNOMAH STREET STE 2000 PORTLAND OR 97232 oregondockets@pacificorp.com CITIZENS' UTILITY BOARD OF OREGON (W)
LOWREY R BROWN
JASON EISDORFER
ROBERT JENKS
610 SW BROADWAY STE 308
PORTLAND OR 97205
lowrey@oregoncub.org
jason@oregoncub.org
bob@oregoncub.org

**PACIFICORP** 

NATALIE HOCKEN OREGON DOCKETS 825 NE MULTNOMAH SUITE 2000 PORTLAND OR 97232 natalie.hocken@pacificorp.com

W = Waived Paper Service

#### BEFORE THE PUBLIC UTILITY COMMISSION

#### OF OREGON

#### **UM 1360**

PETITION TO INTERVENE OF THE INDUSTRIAL CUSTOMERS OF
NORTHWEST UTILITIES

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 S.W. Taylor, 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 attorneys and consultant at the following addresses:

Melinda J. Davison
Irion Sanger
RFI Consulting, Inc.
Davison Van Cleve, P.C.
8343 Roswell Road
PMB 362

Portland, OR 97204 Sandy Springs, GA 30350 E-Mail: ias@dvclaw.com E-Mail: consultrfi@aol.com Telephone: (503) 241-7242 Telephone: (770) 379-0505 Facsimile: (503) 241-8160 Facsimile: (770) 671-1046

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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 on

Attachment A.

4. ICNU has a substantial interest in PacifiCorp's Application for approval of

a solicitation process for flexible resources starting in 2012 through 2017. PacifiCorp filed its

Application on December 24, 2007, and the Commission approved the use of the Accion Group

and Boston Pacific Company, Inc. as the Oregon Independent Evaluators ("IEs"). Re

PacifiCorp, Docket No. UM 1360, Order No. 08-019 (Jan. 16, 2008). ICNU supported the

reappointment of the Oregon IEs without a formal selection process because of the unique

factual circumstances of PacifiCorp's new resource solicitation process for 2012 to 2017.

5. ICNU has extensive experience with PacifiCorp's rates and resource

solicitation process. 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.

7. ICNU waives paper service of documents in this proceeding.

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DAVISON VAN CLEVE, P.C. 333 S.W. Taylor, Suite 400 Portland, OR 97204

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

Dated this 23rd day of January, 2008.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Irion Sanger Melinda J. Davison

Irion Sanger 333 S.W. Taylor, Suite 400 Portland, Oregon 97204

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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.

**BPB** Gypsum

Blue Heron Paper Company

Boeing

\*Boise Cascade

\*ConAgra Foods

Dyno Nobel, Inc.

Eka Chemicals, Inc.

Emerald Kalama Chemical, LLC

\*Evanite Fiber

\*Georgia-Pacific

Grays Harbor Paper, L.P.

\*Hewlett-Packard

**Inland Empire Paper Company** 

Intel

\*J.R. Simplot

Kimberly-Clark Corporation

Longview Fibre

Microsoft Corporation

\*Norpac Foods

Oregon Steel Mills

PCC Structurals, Inc.

Ponderay Newsprint Company

SP Newsprint

Shell Oil Products US

Simpson Paper

Simpson Timber

Solar Grade Silicon, LLC

Tesoro Refining and Marketing Company

\*Wah Chang

West Linn Paper Company

\*Weyerhaeuser

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