

# 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

August 12, 2010

***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, dba PACIFIC POWER Application for  
Deferral of Expenses Associated with a Photovoltaic Volumetric Incentive  
Rate Pilot.  
**Docket No. UM 1483**

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/ Martin H. Patail  
Martin H. Patail

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, 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 12th day of August, 2010.

Sincerely,

/s/ Martin H. Patail

Martin H. Patail

**(W) CITIZENS' UTILITY BOARD OF OREGON**

Gordon Feighner (C)  
Robert Jenks (C)  
G. Catriona Mccracken (C)  
Raymond Myers (C)  
Kevin Elliott Parks (C)  
gordon@oregoncub.org  
bob@oregoncub.org  
catriona@oregoncub.org  
ray@oregoncub.org  
kevin@oregoncub.org

**OREGON PUBLIC UTILITY COMMISSION**

Kelcey Brown  
PO Box 2148  
Salem, OR 97301  
kelcey.brown@state.or.us

**(W) OREGON DEPT. OF ENERGY**

Rob Delmar  
Vijay A. Satyal  
Andrea F. Simmons  
625 Marion St NE  
Salem, OR 97301-3737  
robert.delmar@state.or.us  
vijay.a.satyal@state.or.us  
andrea.f.simmons@state.or.us

**(W) DEPARTMENT OF JUSTICE**

Janet L. Prewitt  
Assistant Attorney General  
Natural Resources Section  
1162 Court St NE  
Salem, OR 97301-4096  
janet.prewitt@state.or.us

**PACIFICORP**

Ryan Flynn  
825 NE Multnomah, Suite 1800  
Portland, OR 97232  
ryan.flynn@pacificorp.com

**PACIFICORP**

Oregon Dockets  
825 NE Multnomah, Suite 2000  
Portland, OR 97232  
oregondockets@pacificorp.com

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1483**

In the Matter of	)	
	)	
PACIFICORP, dba PACIFIC POWER	)	PETITION TO INTERVENE OF THE
	)	INDUSTRIAL CUSTOMERS OF
Application for Deferral of Expenses	)	NORTHWEST UTILITIES
Associated with a Photovoltaic Volumetric	)	
Incentive Rate Pilot.	)	

Pursuant to ORS § 756.525 and OAR § 860-012-0001, 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 § 860-011-0035(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 attorney and consultant at the following address:

Irion A. Sanger Davison Van Cleve, P.C. 333 S.W. Taylor, Suite 400 Portland, OR 97204 E-Mail: <a href="mailto:ias@dvclaw.com">ias@dvclaw.com</a> Telephone: (503) 241-7242 Facsimile: (503) 241-8160	Randall J. Falkenberg RFI Consulting, Inc. 8343 Roswell Road PMB 362 Sandy Springs, GA 30350 E-Mail: <a href="mailto:consultrfi@aol.com">consultrfi@aol.com</a> Telephone: (770) 379-0505 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 (the "Company"), as shown on Attachment A.

4. ICNU has a substantial interest in PacifiCorp's Application for Deferral of Expenses Associated with a Photovoltaic Volumetric Incentive Rate Pilot, which the Company filed on May 6, 2010. The filing proposes to defer costs that may be included in rates that PacifiCorp provides to ICNU's members.

5. ICNU has extensive experience with PacifiCorp's deferral requests, rates and with previous proceedings involving renewable resources. 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.

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

Dated this 12th day of August, 2010.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Irion A. Sanger

Irion A. Sanger

333 S.W. Taylor, Suite 400

Portland, Oregon 97204

(503) 241-7242 phone

(503) 241-8160 facsimile

mail@dvclaw.com

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 Paper  
\*Boise Cascade LLC  
\*ConAgra Foods  
\*D.R. Johnson Lumber Co.  
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  
International Paper  
J.R. Simplot  
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.  
\*Wah Chang  
West Linn Paper Company  
\*Weyerhaeuser

*\*Denotes PacifiCorp Customers*