

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1514

In the Matter of)	
)	
PORTLAND GENERAL ELECTRIC)	PETITION TO INTERVENE OF THE
)	INDUSTRIAL CUSTOMERS OF
Application for Deferral of Incremental Costs)	NORTHWEST UTILITIES
Associated with Automated Demand)	
Response.)	

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:

S. Bradley Van Cleve
Jocelyn C. Pease
Davison Van Cleve, P.C.
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Vancouver, WA 98660
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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 PGE, as shown on Attachment A.

4. PGE filed its Application for Deferral of Incremental Costs Associated with Automated Demand Response ("Application") on December 29, 2010. The Application requests deferred accounting treatment for the incremental costs associated with the Automated Demand Response pilot program. ICNU has a substantial interest in PGE's Application because it proposes to defer costs that may be included in PGE's rates paid by ICNU's members.

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

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

Dated this 16th day of February, 2011.

Respectfully submitted,

/s/ Bradley Van Cleve

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Of Attorneys for Industrial Customers

of Northwest Utilities

INDUSTRIAL
CUSTOMERS OF
NORTHWEST
UTILITIES

MICHAEL B. EARLY
EXECUTIVE DIRECTOR

ATTACHMENT A
INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

Air Liquide
Air Products
Ampcor Rigid Plastics
Certain Teed Gypsum & Ceiling Manufacturing, Inc. (BPB)
Blue Heron Paper Company**
Boeing**
Boise Cascade LLC
Boise Paper**
ConAgra Foods
D R Johnson Lumber Company
Dyno Nobel, Inc.
Eka Chemicals, Inc.
Emerald Performance Materials, 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
JR 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.
Treetop**
Wah Chang
West Linn Paper Company**
Weyerhaeuser

***Denotes PGE Customer*

Davison Van Cleve PC

Attorneys at Law

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February 16, 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 PORTLAND GENERAL ELECTRIC Application for
Deferral of Incremental Costs Associated with Automated Demand
Response
Docket No. UM 1514

Dear Filing Center:

Enclosed please find the original Petition to Intervene and signatory page of the Protective Agreement 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 and Signatory Page of the Protective Agreement 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 16th day of February, 2011.

Sincerely,

/s/ Sarah A. Kohler
Sarah A. Kohler

(W) CITIZENS UTILITY BOARD OF OREGON

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DEPARTMENT OF JUSTICE

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PORTLAND GENERAL ELECTRIC

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