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 8, 2012

Via Electronic and US Mail

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

> In the Matter of Public Utility Commission of Oregon Investigation Into Re:

Qualifying Facility Contracting and Pricing

Docket No. UM 1610

Dear Filing Center:

Enclosed please find the original and one (1) copy of the 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

Service List cc:

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 8th day of August, 2012.

Sincerely,

/s/ Sarah A. Kohler Sarah A. Kohler

(W) PUBLIC UTILITY COMMISSION OF OREGON

ADAM BLESS P.O. Box 2148 Salem OR 97308-2148 adam.bless@state.or.us

(W) IDAHO POWER COMPANY

DONOVAN E WALKER REGULATORY DOCKETS PO BOX 70 BOISE ID 83707-0070 dwalker@idahopower.com dockets@idahopower.com

(W) DEPARTMENT OF JUSTICE

STEPHANIE S ANDRUS, AAG BUSINESS ACTIVITIES SECTION 1162 COURT ST NE SALEM OR 97301-4096 stephanie.andrus@doj.state.or.us

(W) ESLER STEPHENS & BUCKLEY

JOHN W STEPHENS 888 SW FIFTH AVE STE 700 PORTLAND OR 97204-2021 stephens@eslerstephens.com; mec@eslerstephens.com

(W) MCDOWELL RACKNER & GIBSON

PC

LISA F RACKNER 419 SW 11TH AVE., SUITE 400 PORTLAND OR 97205 dockets@mcd-law.com

(W) RENEWABLE NORTHWEST

PROJECT

MEGAN WALSETH DECKER RNP DOCKETS 421 SW 6TH AVE., STE. 1125 PORTLAND OR 97204 megan@rnp.org

dockets@rnp.org

(W) OREGON DEPARTMENT OF ENERGY

RENEE M FRANCE NATURAL RESOURCES SECTION 1162 COURT ST NE SALEM OR 97301-4096 renee.m.france@doj.state.or.us

(W) PORTLAND GENERAL ELECTRIC

RANDY DAHLGREN - 1WTC0702 J. RICHARD GEORGE - 1WTC1301 121 SW SALMON ST PORTLAND OR 97204 pge.opuc.filings@pgn.com richard.george@pgn.com

(W) PACIFICORP

R BRYCE DALLEY 825 NE MULTNOMAH ST., STE 2000 PORTLAND OR 97232 bryce.dalley@pacificorp.com

MARY WIENCKE 825 NE MULTNOMAH ST, STE 1800 PORTLAND OR 97232-2149 mary.wiencke@pacificorp.com

(W) OREGON DEPARTMENT OF ENERGY

MATT KRUMENAUR VIJAY A SATYAL 625 MARION ST NE SALEM OR 97301 matt.krumenauer@state.or.us vijay.a.satyal@state.or.us

(W) THOMAS NELSON

PO BOX 1211 WELCHES OR 97067-1211 nelson@thnelson.com

(W) RICHARDSON & O'LEARY GREGORY M ADAMS PETER J RICHARDSON PO BOX 7218 BOISE ID 83702 greg@richardsonandoleary.com peter@richardsonandoleary.com

(W) RENEWABLE ENERGY COALITION

JOHN LOWE 12050 SW TREMONT ST PORTLAND OR 97225-5430 jravenesanmarcos@yahoo.com

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1610

In the Matter of)	
)	PETITION TO INTERVENE OF THE
PUBLIC UTILITY COMMISSION OF)	INDUSTRIAL CUSTOMERS OF
OREGON)	NORTHWEST UTILITIES
)	
Investigation Into Qualifying Facility)	
Contracting and Pricing)	

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:

Industrial Customers of Northwest Utilities 818 SW 3rd Avenue, #266 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 address:

S. Bradley Van Cleve Irion A. Sanger Davison Van Cleve, P.C. 333 S.W. Taylor, Suite 400 Portland, OR 97204

E-Mail: bvc@dvclaw.com

ias@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.

4. On April 25, 2012, the Public Utility Commission of Oregon ("OPUC" or the "Commission") opened a generic docket to investigate issues related to electric utilities' purchases from Qualifying Facilities ("QFs"). ICNU has a substantial interest in the Commission's Investigation Into Qualifying Facility Contracting and Pricing. ICNU has a substantial interest in the outcome of the Commission's investigation, because it could change the prices available to QFs and impact the price of power paid by ratepayers. This proceeding could directly affect those of ICNU's members who purchase power from, or sell power as QFs to, utilities.

- 5. ICNU has participated in numerous other proceedings related to QFs, including UM 1129, UM 1396, and AR 521. As a result, ICNU has knowledge and expertise that may assist the Commission in resolving the issues in the proceeding. ICNU's intervention in this proceeding 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

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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 August 8th day of August, 2012.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Irion A. Sanger
S. Bradley Van Cleve
Irion A. Sanger
333 S.W. Taylor, Suite 400
Portland, Oregon 97204
(503) 241-7242 phone
(503) 241-8160 facsimile
bvc@dvclaw.com
ias@dvclaw.com

Of Attorneys for Industrial Customers

of Northwest Utilities

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