

# Davison Van Cleve PC

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July 25, 2016

## *Via Electronic Filing*

Public Utility Commission of Oregon  
Attn: Filing Center  
201 High St. SE, Suite 100  
Salem OR 97301

Re: In the Matter of PORTLAND GENERAL ELECTRIC CO.  
Application for Approval of Sale of Harborton Restoration Property (**UP 344**);  
Application to Defer Revenues and Costs Related to the Environmental  
Remediation Costs Recovery Adjustment, Schedule 149 (**UM 1789**); and  
Schedule 149, Environmental Remediation Costs Recovery Adjustment (**UE 311**)  
(*consolidated*)

Dear Filing Center:

Enclosed for filing in the above-referenced dockets, please find the Petition to Intervene of the Industrial Customers of Northwest Utilities.

Thank you for your assistance. If you have any questions, please do not hesitate to call.

Sincerely,

/s/ Jesse O. Gorsuch  
Jesse O. Gorsuch

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION**

**OF OREGON**

**UP 344, UM 1789, and UE 311**

In the Matter of	)	
	)	
PORTLAND GENERAL ELECTRIC	)	PETITION TO INTERVENE OF THE
COMPANY,	)	INDUSTRIAL CUSTOMERS OF
	)	NORTHWEST UTILITIES
Application for Approval of Sale of Harborton	)	
Restoration Property (UP 344);	)	
	)	
Application to Defer Revenues and Costs	)	
Related to the Environmental Remediation	)	
Costs Recovery Adjustment, Schedule 149	)	
(UM 1789); and	)	
	)	
Schedule 149, Environmental Remediation	)	
<u>Costs Recovery Adjustment (UE 311).</u>	)	

Pursuant to ORS § 756.525 and OAR § 860-001-0300(2), the Industrial Customers of Northwest Utilities (“ICNU”) hereby petitions the Oregon Public Utility Commission (“Commission”) to intervene in these proceedings with full party status as described in OAR § 860-001-0010(7). In support of this petition, ICNU represents as follows:

1. The business address of ICNU is:  
  
Industrial Customers of Northwest Utilities  
818 SW 3rd Ave., #266  
Portland, OR 97204
2. ICNU will be represented in these proceedings by Davison Van Cleve,

P.C. All documents relating to these proceedings should be served on ICNU’s attorney at the following address:

Tyler C. Pepple  
Davison Van Cleve, P.C.  
333 S.W. Taylor, Ste. 400  
Portland, OR 97204  
E-Mail: tcp@dvclaw.com  
Telephone: (503) 241-7242  
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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 members of ICNU are customers of Portland General Electric Company (“PGE”), as indicated on Attachment A.

4. On July 15, 2016, PGE made three separate filings in connection with the Portland Harbor Superfund Site. In the filing docketed as UP 344, PGE requests authorization to sell the Harborton Restoration Project Property (“Property”); in the filing docketed as UE 311, PGE seeks rate treatment of the environmental remediation costs and benefits related to the Property; and in the filing docketed as UM 1789, PGE seeks to defer these costs for later treatment in ratemaking. The Commission consolidated these filings through Order No 16-270, entered on July 18, 2016. The outcome of these proceedings may impact the future rates of ICNU members who take service from PGE. Accordingly, ICNU requests leave to intervene in these Dockets to represent its members who are affected by any change to PGE’s rates.

5. ICNU represents the interests of a number of large electric customers served by PGE in Oregon. ICNU’s intervention in these proceedings will assist the Commission in resolving the issues in these proceedings and will not unreasonably broaden the issues, burden the record, or unreasonably delay these proceedings.

6. As described above, ICNU has a direct and substantial interest in these proceedings 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 these proceedings.

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

Dated this 25th day of July, 2016.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

Tyler C. Pepple

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Of Attorneys for the Industrial Customers of  
Northwest Utilities

**ATTACHMENT A**  
**MEMBERS OF INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES**

Air Liquide  
Air Products  
AkzoNobel  
Alcoa  
Amcors Rigid Plastics  
Axiell, Inc.  
\*Boeing  
\*Boise Cascade, LLC  
Certain Teed Gypsum & Ceiling Manufacturing (BPB)  
Columbia Steel  
ConAgra Foods  
\*Darigold  
Dyno Nobel, Inc.  
Emerald Performance Materials, LLC  
\*Evraz, Inc.  
Freres Lumber Co.  
\*Georgia-Pacific  
Grant PUD Industries  
Inland Empire Paper Co.  
\*Intel Corp  
\*International Paper  
\*J.R. Simplot  
Kapstone Kraft Paper  
\*Legacy Health  
\*Linde, Inc.  
Microsoft Corporation  
\*Norpac Foods  
Northwest Hardwoods  
\*Packaging Corporation of America  
\*PCC Structurals, Inc.  
Ponderay Newsprint  
REC Solar Grade Silicon LLC  
\*Schnitzer Steel  
Shell Oil Products US  
Tesoro Refining and Marketing Co.  
Timber Products, Inc.  
Wah Chang  
\*WestRock  
\*West Linn Paper Company  
Weyerhaeuser

*\*Denotes PGE Customers*