# Davison Van Cleve PC

## Attorneys at Law

TEL (503) 241-7242 • FAX (503) 241-8160 • jog@dvclaw.com

Suite 400 333 SW Taylor Portland, OR 97204

January 9, 2017

### 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 PACIFICORP, dba PACIFIC POWER,

Application for Transportation Electrification Outreach and Education Pilot

Program

Docket No. UM 1810

Dear Filing Center:

Enclosed for filing in the above-referenced docket, 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

#### **UM 1810**

In the Matter of	)
PACIFICORP, dba PACIFIC POWER	) PETITION TO INTERVENE OF THE ) INDUSTRIAL CUSTOMERS OF
Application for Transportation Electrification	) NORTHWEST UTILITIES
Outreach and Education Pilot Program.	) )

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). 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 attorney staff and independent consultant at the following addresses:

Jesse E. Cowell

Davison Van Cleve, P.C.

333 S.W. Taylor, Suite 400

Portland, OR 97204

Portland, OR 97204 E-Mail: brmullins@mwanalytics.com

E-Mail: jec@dvclaw.com Telephone: (503) 954-2852 Telephone: (503) 241-7242 Facsimile: (503) 241-8160 Facsimile: (503) 241-8160

PAGE 1 – PETITION TO INTERVENE OF ICNU

Riley G. Peck

Davison Van Cleve, P.C.

333 S.W. Taylor, Ste. 400

Portland, OR 97204

E-Mail: rgp@dvclaw.com

Telephone: (503) 241-7242

Facsimile: (503) 241-8160

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 (or, the

"Company"), as indicated on Attachment A.

4. ICNU has a substantial interest in the Company's proposed Transportation

Electrification Outreach and Education Pilot Program. Costs associated with the proposed

program may have a direct bearing on ICNU member rates. Moreover, the Company's proposal

is expressly aimed at outreach to non-residential customers, including potential assistance and

partnership with ICNU members. The outcome of this proceeding may impact the future rates

and services of those of ICNU's members who take service from PacifiCorp. Accordingly,

ICNU requests leave to intervene in this Docket to represent its members who are affected by

any change to PacifiCorp's rates and customer service.

5. ICNU represents the interests of a number of large electric customers

served by the Company in Oregon, and in this capacity routinely participates in proceedings

affecting PacifiCorp's rates and customer service. ICNU intends to address issues that could

have a significant impact on future customer rates and service. 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.

PAGE 2 – PETITION TO INTERVENE OF ICNU

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

Telephone: (503) 241-7242

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 connected with this proceeding. 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 9th day of January, 2017.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Jesse E. Cowell

Jesse E. Cowell

333 S.W. Taylor, Suite 400

Portland, Oregon 97204

(503) 241-7242 (phone)

(503) 241-8160 (facsimile)

jec@dvclaw.com

Of Attorneys for the Industrial Customers of

Northwest Utilities

PAGE 3 – PETITION TO INTERVENE OF ICNU

DAVISON VAN CLEVE, P.C. 333 S.W. Taylor, Suite 400 Portland, OR 97204 Telephone: (503) 241-7242

#### ATTACHMENT A

#### MEMBERS OF THE INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

Air Liquide

Air Products

AkzoNobel

Alcoa

**Amcor Rigid Plastics** 

Axiall, 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