Davison Van Cleve PC

Attorneys at Law

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January 6, 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 PORTLAND GENERAL ELECTRIC CO.

Application for Transportation Electrification Programs

Docket No. UM 1811

Dear Filing Center:

Please find enclosed the Petition to Intervene of the Industrial Customers of Northwest Utilities in the above-referenced docket.

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 1811

In the Matter of)
) PETITION TO INTERVENE OF THE
PORTLAND GENERAL ELECTRIC) INDUSTRIAL CUSTOMERS OF
COMPANY) NORTHWEST UTILITIES
)
Application for Transportation Electricification	
Programs)
)

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 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 Ave., #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 addresses:

Tyler C. Pepple Bradley G. Mullins
Davison Van Cleve, P.C. 333 S.W. Taylor, Ste. 400
Portland, OR 97204

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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 December 27, 2016, PGE filed a proposal for a transportation

electrification program, as was required by Section 20(3) of Senate Bill 1547, codified at Oregon

Laws 2016, chapter 028, sections 20 and 29, and the Commission's newly promulgated

administrative rules. OAR 860-087-0030(2). PGE's proposal estimates a revenue requirement

impact of approximately \$8.7 million, could require the addition of significant new utility-owned

infrastructure in the PGE service area, and would potentially increase customer demand as well.

Accordingly, the outcome of this proceeding may impact the future rates of those of ICNU's

members who take service from PGE. ICNU therefore requests leave to intervene in this Docket

to represent its members who are affected by any change to PGE's rates.

ICNU represents the interests of a number of large electric customers

served by PGE in Oregon. ICNU's intervention in this proceeding will assist the Commission in

resolving the issues in this proceeding and will not unreasonably broaden the issues, burden the

record, or unreasonably delay this proceeding.

5.

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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 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 6th day of January, 2017.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

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ATTACHMENT A

MEMBERS OF 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

^{*}Denotes PGE Customers