

Davison Van Cleve PC

Attorneys at Law

TEL (503) 241-7242 • FAX (503) 241-8160 • hmt@dvclaw.com
Suite 400
333 SW Taylor
Portland, OR 97204

July 10, 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 COMPANY
Application to Lower the Standard Price Contract Eligibility Cap for
Solar Qualifying Facilities
Docket No. UM 1854

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/ Haley M. Thomas
Haley M. Thomas

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 1854**

In the Matter of)	
)	
PORTLAND GENERAL ELECTRIC)	PETITION TO INTERVENE OF THE
COMPANY,)	INDUSTRIAL CUSTOMERS OF
)	NORTHWEST UTILITIES
)	
Application to Lower the Standard Price)	
Contract Eligibility Cap for Solar Qualifying)	
Facilities)	

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 this proceeding should be served on ICNU’s attorneys and independent consultant at the following addresses:

Tyler C. Pepple	Myraleigh A. Alberto
Davison Van Cleve, P.C.	Davison Van Cleve, P.C.
333 S.W. Taylor, Suite 400	333 S.W. Taylor, Suite 400
Portland, OR 97204	Portland, OR 97204
E-Mail: tcp@dvclaw.com	E-Mail: maa@dvclaw.com
Telephone: (503) 241-7242	Telephone: (503) 241-7242
Facsimile: (503) 241-8160	Facsimile: (503) 241-8160

Bradley G. Mullins
333 S.W. Taylor, Ste. 400
Portland, OR 97204
E-Mail:
brmullins@mwanalytics.com
Telephone: (503) 954-2852
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 Portland General Electric Company ("PGE"), as indicated on Attachment A.

4. ICNU has a substantial interest in PGE's request for an order modifying the terms and conditions under which PGE enters into power purchase agreements with solar qualifying facilities. The outcome of this proceeding may impact the future rates of ICNU members who take service from PGE in Oregon. Accordingly, ICNU members stand to be directly and substantially impacted by the results of this proceeding.

5. ICNU has significant experience participating in proceedings before the Commission. 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.

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. Accordingly, 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 10th day of July, 2017.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

Tyler C. Pepple

Myraleigh A. Alberto

333 S.W. Taylor, Suite 400

Portland, Oregon 97204

Telephone: (503) 241-7242

Facsimile: (503) 241-8160

E-mail: tcp@dvclaw.com

maa@dvclaw.com

Of Attorneys for the Industrial Customers of
Northwest Utilities

ATTACHMENT A
MEMBERS OF THE INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

Airgas USA, LLC
Air Liquide
Air Products
AkzoNobel
Alcoa
Ampcor Rigid Plastics
Axial, Inc.
*Boeing
*Boise Cascade, Inc.
Columbia Steel
Lamb Weston
Darigold
Dyno Nobel, Inc.
Emerald Performance Materials
*Evraz, Inc.
Freres Lumber Co.
Georgia-Pacific
Inland Empire Paper Co.
*Intel Corp
*International Paper
*JR Simplot
Kapstone Kraft Paper
*Legacy Health
*Linde, Inc.
Microsoft Corporation
Nippon Dynawave Packaging Co.
*Norpac Foods
North Pacific Paper Co.
Northwest Hardwoods
*Packaging Corporation of America
*Precision Castparts Co.
Ponderay Newsprint
REC Solar Grade Silicon LLC
*Schnitzer Steel
Shell Oil Products US
Tesoro Refining and Marketing Co.
Timber Products
Wah Chang
*WestRock
*West Linn Paper Company
Weyerhaeuser NR Co.

**Denotes PGE Customers*