

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

March 19, 2013

Via Electronic and U.S. Mail

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

Re: In the Matter of Portland General Electric's 2013 Integrated Resource
Plan.
Docket No. LC 56

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

cc: Service List

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 where paper service has been waived.

Dated at Portland, Oregon, this 19th day of March, 2013.

Sincerely,

/s/ Sarah A. Kohler
Sarah A. Kohler

(W) PUC STAFF - DEPARTMENT OF JUSTICE MICHAEL T. WEIRICH 1162 COURT ST NE SALEM OR 97301-4096 michael.weirich@state.or.us	PUBLIC UTILITY COMMISSION OF OREGON JOHN CRIDER PO BOX 2148 SALEM OR 97308 john.crider@state.or.us
PORTLAND GENERAL ELECTRIC V. DENISE SAUNDERS 121 SW SALMON ST 1WTC1301 PORTLAND OR 97204 denise.saunders@pgn.com	

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

LC 56

In the Matter of)	
)	
PORTLAND GENERAL ELECTRIC)	PETITION TO INTERVENE OF THE
COMPANY)	INDUSTRIAL CUSTOMERS OF
)	NORTHWEST UTILITIES
)	
<u>2013 Integrated Resource Plan</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 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 address:

S. Bradley Van Cleve	Donald W. Schoenbeck
Irion A. Sanger	Regulatory & Cogeneration Services,
Davison Van Cleve, P.C.	Inc.
333 S.W. Taylor, Suite 400	900 Washington Street, Suite 780
Portland, OR 97204	Vancouver, WA 98660
E-Mail: bvc@dvclaw.com	E-Mail: dws@r-c-s-inc.com
ias@dvclaw.com	Telephone: (503) 232-6155
Telephone: (503) 241-7242	Facsimile: (360) 737-7628
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 ("PGE"), as shown in Attachment A.

4. ICNU has a substantial interest in PGE's 2013 Integrated Resource Plan ("IRP"). Any Commission decision regarding PGE's 2013 IRP could have an impact on the rates and quality of service that PGE provides to ICNU's members.

5. ICNU represents the interests of a number of large electric customers in the State of Oregon. ICNU has participated in previous least cost proceedings before the Commission, such as PGE's Resource Policies and Plans, which was docketed as LC 33, as well as PGE's most recent IRP case, Docket No. LC 48. 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.

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 19th day of March, 2013.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Irion Sanger

S. Bradley Van Cleve

Irion Sanger

Davison Van Cleve, P.C.

333 S.W. Taylor, Suite 400

Portland, Oregon 97204

(503) 241-7242 telephone

(503) 241-8160 facsimile

bvc@dvclaw.com

ias@dvclaw.com

Of Attorneys for Industrial Customers
of Northwest Utilities

ATTACHMENT A
INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

Air Liquide
Air Products
Ampcor Rigid Plastics
Certain Teed Gypsum & Ceiling Manufacturing, Inc. (BPB)
Boeing**
Boise Cascade LLC
Boise Paper**
ConAgra Foods
D R Johnson Lumber Company
Dyno Nobel, Inc.
Akzo Nobel Pulp and Performance Chemicals, Inc.
Emerald Performance Materials, LLC
Equa-Chlor, LLC
Evraz, Inc.**
Freres Lumber Co.
Georgia-Pacific
Grays Harbor Paper, L.P.
Inland Empire Paper Co.
Intel**
International Paper
JR Simplot**
Linde, Inc.**
Longview Fibre
Microsoft Corporation
Norpac Foods**
PCC Structurals, Inc**
REC Solar Grade Silicon LLC
SP Newsprint**
Shell Oil Products US
Simpson Paper & Timber
Tesoro Refining and Marketing Co.
Wah Chang
West Linn Paper Company**
Weyerhaeuser

***Denotes PGE Customer*