

# Davison Van Cleve PC

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Suite 400  
333 SW Taylor  
Portland, OR 97204

December 4, 2014

*Via Email and Federal Express*

Public Utility Commission of Oregon  
Attn: Filing Center  
3930 Fairview Industrial Dr. SE  
Salem OR 97302

Re: In the Matter of PACIFICORP's 2015 Integrated Resource Plan  
**Docket No. LC 62**

Dear Filing Center:

Enclosed for filing in the above-referenced docket, please find the original and one (1) copy of 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,



Jesse O. Gorsuch

cc: Service List

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have this day served the attached **ICNU Petition to Intervene** upon all parties of record in this proceeding, as shown below, by causing a copy to be sent via electronic mail.

Dated at Portland, Oregon, this 4th day of December, 2014.

Davison Van Cleve, P.C.



Jesse O. Gorsuch

**PACIFIC POWER (W)**  
DUSTIN T. TILL  
825 NE MULTNOMAH ST, STE 1800  
PORTLAND OR 97232-2149  
dustin.till@pacificorp.com

**RENEWABLE NORTHWEST PROJECT (W)**  
MEGAN DECKER  
MICHAEL O'BRIEN  
RENEWABLE NW DOCKETS  
421 SW 6TH AVE #1125  
PORTLAND OR 97204-1629  
megan@renewablenw.org  
michael@renewablenw.org  
dockets@renewablenw.org

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**LC 62**

In the Matter of	)	
	)	PETITION TO INTERVENE OF THE
PACIFICORP, dba PACIFIC POWER	)	INDUSTRIAL CUSTOMERS OF
	)	NORTHWEST UTILITIES
2015 Integrated Resource Plan.	)	
_____	)	

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 (the “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 attorneys and consultant at the following addresses:

Melinda J. Davison Davison Van Cleve, P.C. 333 S.W. Taylor, Suite 400 Portland, OR 97204 E-Mail: <a href="mailto:mjd@dvclaw.com">mjd@dvclaw.com</a> Telephone: (503) 241-7242 Facsimile: (503) 241-8160	Bradley G. Mullins 333 S.W. Taylor, Ste. 400 Portland, OR 97204 E-Mail: <a href="mailto:brmullins@mwanalytics.com">brmullins@mwanalytics.com</a> Telephone: (503) 954-2852 Facsimile: (503) 241-8160
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Jesse E. Cowell  
Davison Van Cleve, P.C.  
333 S.W. Taylor, Suite 400  
Portland, OR 97204  
E-Mail: jec@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 shown in Attachment A.

4. ICNU has a substantial interest in PacifiCorp's 2015 Integrated Resource Plan ("IRP"), which the Company expects to file on or about March 31, 2015. The Company's analysis of its future load and regulatory obligations, along with its proposed plan of action over the next two to four years, may have a direct bearing on rates. Any Commission decision regarding PacifiCorp's 2015 IRP will provide guidelines regarding which resources PacifiCorp acquires in the future, which would impact the rates and quality of service that PacifiCorp provides to ICNU's members.

5. ICNU represents the interests of a number of large electric customers served by PacifiCorp in Oregon. ICNU has participated in many previous integrated resource plan proceedings before the Commission, including PacifiCorp's 2013 IRP, which was docketed as LC 57. 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

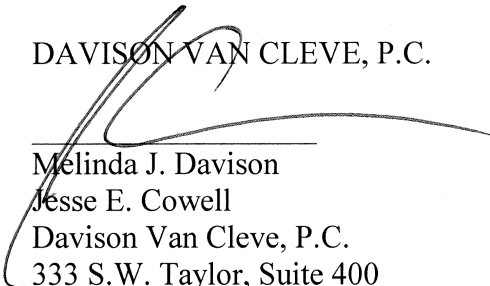
any Commission determination made in connection with this proceeding. It is in the public interest to allow ICNU to intervene in this proceeding.

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

Dated this 4th day of December, 2014.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.



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Melinda J. Davison

Jesse E. Cowell

Davison Van Cleve, P.C.

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Of Attorneys for Industrial Customers  
of Northwest Utilities

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

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

*\*Denotes PacifiCorp Customers*