

Davison Van Cleve PC

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October 31, 2016

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.
2016 Integrated Resource Plan
Docket No. LC 66

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

LC 66

In the Matter of)
)
PORTLAND GENERAL ELECTRIC) PETITION TO INTERVENE OF THE
COMPANY,) INDUSTRIAL CUSTOMERS OF
) NORTHWEST UTILITIES
)
2016 Integrated Resource Plan.)
_____)

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 attorney and consultant at the following addresses:

Tyler C. Pepple
Davison Van Cleve, P.C.
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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 PGE, as indicated on Attachment A.

4. PGE intends to file its 2016 Integrated Resource Plan on November 15, 2016. The Company's analysis of its future load and regulatory obligations may have a direct bearing on rates paid by ICNU's members who purchase power from PGE. Accordingly, ICNU requests leave to intervene in this Docket to represent its members who are affected by any change to PGE's rates.

5. 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.

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 31st day of October, 2016.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

Tyler C. Pepple

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Of Attorneys for the Industrial Customers of
Northwest Utilities

ATTACHMENT A
MEMBERS OF INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

Air Liquide
Air Products
AkzoNobel
Alcoa
Amcors Rigid Plastics
Axiell, 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*