

**BEFORE THE PUBLIC UTILITY COMMISSION**

**OF OREGON**

**UE 250**

In the Matter of )  
 )  
PORTLAND GENERAL ELECTRIC ) PETITION TO INTERVENE OF THE  
COMPANY ) INDUSTRIAL CUSTOMERS OF  
 ) NORTHWEST UTILITIES  
 )  
2013 Annual Power Cost Update Tariff )  
(Schedule 125) )  

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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:

S. Bradley Van Cleve	Donald W. Schoenbeck
Irion A. Sanger	Regulatory & Cogeneration Services, Inc.
Davison Van Cleve, P.C.	900 Washington Street, Suite 780
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Portland, OR 97204	E-Mail: dws@r-c-s-inc.com
E-Mail: mail@dvclaw.com	Telephone: (503) 232-6155
ias@dvclaw.com	Facsimile: (360) 737-7628
Telephone: (503) 241-7242	

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. ICNU has a substantial interest in the impacts of PGE’s 2013 Annual Power Cost Update Tariff (“AUT”). The proposed rate change under the terms of PGE’s AUT would substantially and directly affect those ICNU members who purchase power from PGE. PGE’s proposal also will impact the transition adjustment for ICNU members who are eligible for direct access. ICNU requests leave to intervene in this Docket to represent its members who are affected by the operation of PGE’s AUT.

5. ICNU represents the interests of many of PGE’s largest customers. ICNU has participated in PGE’s prior general rate cases, including Docket Nos. UE 180, UE 197, and UE 215, as well as PGE’s most recent annual update proceedings, including Docket Nos. UE 181, UE 198, UE 208, and UE 228. 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 these proceedings. 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 12th day of April, 2012.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ S. Bradley Van Cleve

S. Bradley Van Cleve

Irion A. Sanger

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Of Attorneys for the 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.  
Eka Chemicals, Inc.  
Emerald Performance Materials, LLC  
Equa-Chlor, LLC  
Evraz, Inc.\*\*  
Freres Lumber Co.  
Georgia-Pacific  
Grays Harbor Paper, L.P.  
Hewlett-Packard  
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*

# Davison Van Cleve PC

Attorneys at Law

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April 12, 2012

*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 COMPANY  
2013 Annual Power Cost Update Tariff (Schedule 125)  
**Docket No. UE 250**

Dear Filing Center:

Enclosed please find an 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 attention to this matter.

Sincerely yours,

/s/ Jacqueline E. Smith  
Jacqueline E. Smith

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 12th day of April, 2012.

/s/ Jacqueline E. Smith  
Jacqueline E. Smith

**(W) PUBLIC UTILITY COMMISSION OF OREGON**  
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