

Davison Van Cleve PC

Attorneys at Law

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Portland, OR 97204

July 12, 2012

Via Electronic and US 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 2011 Annual
Power Cost Variance Mechanism
Docket No. UE 256

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.

Dated at Portland, Oregon, this 12th day of July, 2012.

Sincerely,

/s/ Sarah A. Kohler
Sarah A. Kohler

(W) PORTLAND GENERAL ELECTRIC
Patrick Hager – 1WTC0702
Douglas C. Tingey – 1WTC1301
121 SW Salmon St.
Portland, OR 97204
pge.opuc.filings@pgn.com
doug.tingey@pgn.com

PUC STAFF – DEPARTMENT OF JUSTICE
Stephanie S. Andrus
BUSINESS ACTIVITIES SECTION
1162 COURT ST NE
SALEM OR 97301-4096
stephanie.andrus@state.or.us

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 256

In the Matter of)	
)	
PORTLAND GENERAL ELECTRIC)	PETITION TO INTERVENE OF THE
)	INDUSTRIAL CUSTOMERS OF
2011 Annual Power Cost Variance)	NORTHWEST UTILITIES
<u>Mechanism</u>)	

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). ICNU waives paper service of all non-confidential filings. 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 address:

S. Bradley Van Cleve
Irion A. Sanger
Davison Van Cleve, P.C.
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PAGE 1 – PETITION TO INTERVENE OF ICNU

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 shown on Attachment A.

4. On June 29, 2012, PGE filed testimony associated with its 2011 Annual Power Cost Variance Mechanism ("PCAM") with the Commission. PGE claims that its actual power costs for the 2011 calendar year period were \$17.3 million lower than the forecasted power costs in rates; however, PGE's PCAM includes a "deadband" under which small differences between actual and forecast net power costs are not charged or refunded to customers. PGE estimates that the PCAM refund to customers will be \$5.5 million after the application of the earnings deadband. ICNU requests leave to intervene in this Docket to represent its members who are affected by the operation of PGE's PCAM, and to investigate the refund amount owed to customers.

5. ICNU has extensive experience with PGE's rates and with previous proceedings related to PGE's power cost mechanism. 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 these proceedings. Therefore, 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 July, 2012.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Irion A. Sanger

S. Bradley Van Cleve

Irion A. Sanger

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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.
Eka 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 Customers*