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October 23, 2009

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 THE PUBLIC UTILITY COMMISSION OF OREGON
Investigation into Pilot Programs to demonstrate the use and effectiveness of
Volumetric Incentive Rates for Solar Photovoltaic Energy Systems.
Docket No. UM 1452

Dear Filing Center:

Enclosed please find the original and one copy of the Petition to Intervene of the
Industrial Customers of Northwest Utilities in the above-referenced matter.

Thank you for your assistance.

Sincerely yours,

/s/ Brendan E. Levenick
Brendan E. Levenick

Enclosures

cc: Service List

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing Petition to Intervene of the Industrial Customers of Northwest Utilities upon the parties on the service list, shown below, by causing the same to be sent by electronic mail to all parties, as well as, deposited in the U.S. Mail, postage-prepaid, to parties which have not waived paper service.

Dated at Portland, Oregon, this 23rd day of October, 2009.

/s/ Brendan E. Levenick
Brendan E. Levenick

PUBLIC UTILITY COMMISSION OF OREGON
THERESA GIBNEY
PO BOX 2148
SALEM OR 97308
theresa.gibney@state.or.us

DEPARTMENT OF JUSTICE
PAUL GRAHAM
1162 COURT ST NE
SALEM OR 97301-4096
paul.graham@state.or.us

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1452

In the Matter of)	
)	
THE PUBLIC UTILITY COMMISSION OF)	PETITION TO INTERVENE OF THE
OREGON)	INDUSTRIAL CUSTOMERS OF
)	NORTHWEST UTILITIES
Investigation into Pilot Programs to)	
demonstrate the use and effectiveness of)	
Volumetric Incentive Rates for Solar)	
<u>Photovoltaic Energy Systems.</u>)	

Pursuant to ORS § 756.525 and OAR § 860-012-0001, the Industrial Customers of Northwest Utilities (“ICNU”) petitions the Public Utility Commission of Oregon (“OPUC” or the “Commission”) to intervene in this proceeding with full party status as described in OAR § 860-011-0035(5). In support of this petition, ICNU represents as follows:

1. The business address of ICNU is:

Michael Early
Industrial Customers of Northwest Utilities
333 S.W. Taylor, Suite 400
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 at the following addresses:

Melinda J. Davison
Irion A. Sanger
Davison Van Cleve, P.C.
333 S.W. Taylor, Suite 400
Portland, OR 97204
E-Mail: mail@dvclaw.com
ias@dvclaw.com
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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 of ICNU's members are customers of Portland General Electric Company ("PGE"), as well as PacifiCorp.

4. ICNU represents the interests of many of the largest customers of PGE and PacifiCorp. ICNU has participated in numerous proceedings that have affected PGE's rates and recovery of costs. ICNU also routinely participates in PacifiCorp cases filed with the OPUC, including PacifiCorp's pending general rate case, UE 210.

5. ICNU represents the interests of a number of large electric customers in the State of 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 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 23rd day of October, 2009.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Irion A. Sanger

Melinda J. Davison

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
Amcor PET Packaging USA, Inc. (CNC Containers Northwest)
Certain Teed Gypsum & Ceiling Manufacturing, Inc. (BPB)
Blue Heron Paper Company
Boeing
Boise Cascade, LLC
Boise Paper
ConAgra Foods
Dyno Nobel, Inc.
Eka Chemicals, Inc.
Emerald Performance Materials, LLC
Equa-Chlor, LLC
Evanite Fiber
Evraz, Inc.
Freres Lumber Co.
Georgia-Pacific
Grays Harbor Paper, L.P.
Hewlett-Packard
Inland Empire Paper Co.
Intel
International Paper
J.R. Simplot
Kimberly-Clark Corporation
Linde, Inc.
Longview Fibre
Microsoft Corporation
Norpac Foods
PCC Structural, Inc.
Ponderay Newsprint
REC Solar Grade Silicon LLC
Shell Oil Products US
Simpson Paper & Timber
SP Newsprint
Tesoro Refining and Marketing Co.
Wah Chang
West Linn Paper Company
Weyerhaeuser