

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1713

In the Matter of)
)
PUBLIC UTILITY COMMISSION OF) PETITION TO INTERVENE OF THE
OREGON) INDUSTRIAL CUSTOMERS OF
) NORTHWEST UTILITIES
)
Investigation into Large Customer Energy)
Efficiency Limitations)
)
)
)

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 this proceeding should be served on ICNU’s attorneys and consultant at the following addresses:

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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 PacifiCorp and Portland General Electric Company (“PGE”), as indicated on Attachment A.

4. The Commission’s investigation in this case may impact both the funding available to, and provided by, large customers of PGE and PacifiCorp through the Energy Trust of Oregon (“ETO”). The Commission opened this investigation, pursuant to Order No. 14-415, to effectuate a stipulation between the parties to PGE’s most recent rate case, including ICNU. This settlement resolved a marginal cost rate spread issue raised by the Citizens’ Utility Board in the rate case that would have raised rates for PGE’s largest customers by millions of dollars based on certain assumptions about energy efficiency funding. The stipulation requests that the Commission examine whether there are barriers to the ETO’s ability to obtain all cost-effective energy efficiency from large customers, whether large customers are receiving a “direct benefit” from conservation measures funded by amounts collected pursuant to Senate Bill 838, and other similar issues. As such, ICNU’s members stand to be directly and substantially impacted by the results of this investigation.

5. ICNU has significant experience participating in proceedings before the Commission. 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 4th day of February, 2015.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.



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Of Attorneys for the Industrial Customers of
Northwest Utilities

ATTACHMENT A

INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

Air Liquide
Air Products
AkzoNoebel
Alcoa
Ampcor Rigid Plastics
Axiall, Inc.
#*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 Corp
#*International Paper
*JR Simplot
#Kapstone Kraft Paper
*Linde, Inc.
Microsoft Corporation
#*Norpac Foods
#Northwest Hardwoods
#*Packaging Corporation of America
#*PCC Structural, Inc.
Ponderay Newsprint
REC Solar Grade Silicon LLC
RockTenn
*Schnitzer Steel
Shell Oil Products US
*SP Fiber Technologies
Tesoro Refining and Marketing Co.
#Timber Products
#Wah Chang
*West Linn Paper Company
#Weyerhaeuser

**Denotes PGE Customers*

#Denotes PacifiCorp Customers

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February 4, 2015

Via E-Mail and Federal Express

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

Re: PUBLIC UTILITY COMMISSION OF OREGON
Investigation into Large Customer Energy Efficiency Limitations
Docket No. UM 1713

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

Enclosures

cc: Service List

CERTIFICATE OF SERVICE

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

Dated at Portland, Oregon, this 4th day of February, 2015.



Jesse O. Gorsuch

(W) CITIZENS' UTILITY BOARD OF OREGON

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