

# Davison Van Cleve PC

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March 14, 2016

***Via Electronic Filing***

Public Utility Commission of Oregon  
Attn: Filing Center  
201 High St. SE, Suite 100  
Salem OR 97301

Re: PUBLIC UTILITY COMMISSION OF OREGON  
Implementing Energy Storage Program Guidelines Pursuant to  
House Bill 2193  
**Docket UM 1751**

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**

**UM 1751**

In the Matter of )  
 )  
PUBLIC UTILITY COMMISSION OF ) PETITION TO INTERVENE OF THE  
OREGON ) INDUSTRIAL CUSTOMERS OF  
 ) NORTHWEST UTILITIES  
 )  
Implementing Energy Storage Program )  
Guidelines pursuant to House Bill 2193. )  
\_\_\_\_\_ )

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 at the following address:

Tyler C. Pepple  
Davison Van Cleve, P.C.  
333 S.W. Taylor, Ste. 400  
Portland, OR 97204  
E-Mail: tcp@dvclaw.com  
Telephone: (503) 241-7242  
Facsimile: (503) 241-8160

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 the future rates ICNU’s members pay to PacifiCorp and PGE. 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 14th day of March, 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  
Axiall, 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*

*#Denotes PacifiCorp Customers*