

**BEFORE THE**

**WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of ) DOCKET NO. UE-060926  
)  
PACIFIC POWER & LIGHT COMPANY ) PETITION TO INTERVENE OF THE  
) INDUSTRIAL CUSTOMERS OF  
Petition for accounting order approving ) NORTHWEST UTILITIES  
deferral of environmental remediation costs. )  
\_\_\_\_\_ )

1 Pursuant to WAC § 480-07-355, the Industrial Customers of Northwest Utilities (“ICNU”) hereby petitions the Washington Utilities and Transportation Commission (“WUTC” or “Commission”) for leave to intervene in the above-referenced Docket, as an intervenor with full party status as described in WAC § 480-07-340. The business address of ICNU is:

Michael Early  
Executive Director  
Industrial Customers of Northwest Utilities  
333 S.W. Taylor, Suite 400  
Portland, OR 97204

ICNU will be represented in this proceeding by Davison Van Cleve, P.C. All documents relating to these proceedings should also be served on ICNU’s attorneys and consultant at the following addresses:

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Irion Sanger	RFI Consulting
Davison Van Cleve, P.C.	PMB 362
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2 The administrative rules at issue are WAC §§ 480-07-340, -355.

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3 ICNU is an incorporated, non-profit association of large industrial electric  
customers in the Pacific Northwest. A list of ICNU members is included as  
Attachment A. Many members of ICNU purchase power from PacifiCorp, as indicated  
on Attachment A, and represent some of PacifiCorp's largest customers.

4 On June 5, 2006, PacifiCorp filed a petition for an accounting order  
approving the deferral of environmental remediation costs associated with the Utah  
Metals and Union Pacific Railroad property ("Petition"). ICNU's member companies  
have a substantial interest in PacifiCorp's Petition. The deferral account proposed in this  
Docket may directly affect the rates that PacifiCorp provides to several of ICNU's  
members.

5 ICNU opposes PacifiCorp's Petition in this Docket due to several  
concerns with the Petition. The expenses associated with the environmental remediation  
costs may have been incurred prior to the date that the Petition was filed, and allowing a  
deferral of these costs likely violates the prohibition against retroactive ratemaking. In  
addition, PacifiCorp has not shown that the Utah Metals and Union Pacific Railroad  
property is used and useful for providing service to customers in Washington.

6 ICNU has extensive experience involving PacifiCorp's rates. ICNU  
participated in PacifiCorp's most recent rate cases, including UE-991832, UE-032065,  
and UE-050684. 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.

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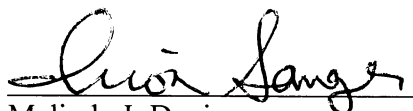
7                   As described above, ICNU has a direct and substantial interest in this proceeding that will not be adequately represented by any other party, and may be affected by any Commission determination made in connection with this proceeding. It is in the public interest to allow ICNU to intervene in this proceeding.

8                   WHEREFORE, ICNU respectfully petitions the Commission for leave to intervene in this proceeding.

Dated in Portland, Oregon, this 21st day of June, 2006.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.



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Of Attorneys for Industrial Customers  
of Northwest Utilities

**ATTACHMENT A**  
**INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES**

Air Liquide  
Air Products  
BPB Gypsum, Inc.  
Blue Heron Paper Company  
Boeing  
\*Boise Cascade  
CNC Containers, Northwest  
Chemi-Con Materials Corporation  
Dyno Nobel, Inc.  
ConAgra Foods  
Eka Chemicals, Inc.  
Evanite Fiber  
Georgia-Pacific  
Grays Harbor Paper, L.P.  
Hewlett-Packard  
Inland Empire Paper Co.  
Intel  
\*J.R. Simplot  
Kimberly-Clark Corporation  
\*Longview Fibre  
Microsoft Corporation  
Norpac Foods  
Noveon Kalama, Inc.  
Oregon Steel Mills  
PCC Structural, Inc.  
Ponderay Newsprint Co  
Shell Oil Products US  
Simpson Paper  
Simpson Timber  
Solar Grade Silicon LLC  
SP Newsprint Co.  
Tesoro Refining and Marketing Co.  
Wah Chang  
West Linn Paper Company  
\*Weyerhaeuser

*\*Denotes PacifiCorp Customers in Washington*