

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,)	
)	
Complainant,)	DOCKET NO. UE 121373
)	
v.)	PETITION TO INTERVENE OF THE
)	INDUSTRIAL CUSTOMERS OF
PUGET SOUND ENERGY, INC.,)	NORTHWEST UTILITIES
)	
Respondent.)	
)	

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

Industrial Customers of Northwest Utilities
818 SW 3rd Avenue, #266
Portland, OR 97204

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 addresses:

Melinda J. Davison
Davison Van Cleve, P.C.
333 S.W. Taylor, Suite 400
Portland, OR 97204
Telephone: 503-241-7242
Facsimile: 503-241-8160
mjd@dvclaw.com

Donald W. Schoenbeck
Regulatory & Cogeneration Services, Inc.
900 Washington Street, Suite 780
Vancouver, WA 98660
Telephone: 503-232-6155
Facsimile: 360-737-7628
dws@r-c-s-inc.com

2 The administrative rules that this petition puts at issue are WAC §480-07-340,
-355.

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 Puget Sound Energy (“PSE” or the
“Company”), as indicated on Attachment A. ICNU has been a party to many proceedings
before the Commission involving PSE, including PSE’s most recent general rate case (UE-
111048).

4 On August 20, 2012, PSE filed a petition requesting that the Commission
approve a Coal Transition Power Purchase and Sale Agreement (“Coal Transition PPA”) by
and between TransAlta Centralia Generation LLC (“TransAlta Centralia”) and PSE. ICNU’s
member companies have a substantial interest in PSE’s request, to ensure that this represents
the most cost effective power supply option for customers. The Commission’s ruling could
directly affect those of ICNU’s members who purchase power, transmission and/or
distribution services from PSE. ICNU requests leave to intervene in this proceeding to
represent its members who are affected by the proposed PPA.

5 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. ICNU, therefore, requests that
the Commission grant its Petition to Intervene and make ICNU a party to this proceeding.

6 ICNU believes its participation in this proceeding will assist the Commission.
Furthermore, ICNU's intervention in this proceeding will not unreasonably broaden the
issues, burden the record, or delay this proceeding.

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

Dated in Portland, Oregon, this 29th day of August, 2012.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Melinda J. Davison

Melinda J. Davison
Davison Van Cleve, P.C.
333 S.W. Taylor, Suite 400
Portland, Oregon 97204
(503) 241-7242 telephone
(503) 241-8160 facsimile
mjd@dvclaw.com
Of Attorneys for Industrial Customers
of Northwest Utilities

ATTACHMENT A
MEMBERS OF INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

*Air Liquide
*Air Products
*Amcors Rigid Plastics
Certain Teed Gypsum
*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
Inland Empire Paper Co.
*Intel
International Paper
J.R. Simplot
Linde, Inc.
Longview Fibre
*Microsoft Corporation
Norpac Foods
PCC Structurals, Inc.
Ponderay Newsprint
REC Solar Grade Silicon LLC
*Shell Oil Products US
Simpson Paper & Timber
*Tesoro Refining and Marketing Co.
Timber Products, Inc.
Wah Chang
West Linn Paper Company
*Weyerhaeuser

*Members served by Puget Sound Energy