

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of)	DOCKET UE-190750
)	
PACIFIC POWER & LIGHT COMPANY,)	
)	PETITION TO INTERVENE OF
Petition for an Order Approving Deferred)	PACKAGING CORPORATION OF
Accounting Related to Repowering the)	AMERICA
Leaning Juniper Wind Facility.)	
_____)	

1 Pursuant to WAC § 480-07-355, Packaging Corporation of America (“PCA”) 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 for PCA is:

Patrick Loupin
Corporate Purchasing Manager – Energy
Packaging Corporation of America
P.O. Box 990050
Boise, ID 83799-0050
PatrickLoupin@packagingcorp.com

2 PCA will be represented in this proceeding by Davison Van Cleve, P.C (“DVC”). All documents relating to this proceeding should be served on PCA through its designated representative above, as well as on PCA’s attorney and independent consultant, respectively, at the following addresses:

Tyler C. Pepple
Davison Van Cleve, P.C.
1750 SW Harbor Way, Suite 450
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Boise does not request paper service, unless required by WUTC rules or law. If permitted by the presiding officer, PCA also requests that electronic service be provided to the following:

Jesse O. Gorsuch
jog@dvclaw.com
Paralegal for DVC

3 The administrative rules at issue are WAC § 480-07-340, -355.

4 PCA manufactures and distributes paper products in the United States, including sheet papers, containerboard and corrugated containers, and market pulp. PCA is Pacific Power & Light Company's ("Pacific Power" or the "Company") largest customer in Washington, purchasing both power and power delivery services at its mill in Wallula, Washington. PCA, appearing through its subsidiary, Boise White Paper, L.L.C ("Boise"), is a party to Pacific Power's current power cost adjustment proceeding, Docket UE-190458, and was a party to the Company's recent pension deferral proceeding, Docket UE-181042, as well as the Company's last general rate case, Docket UE-152253.

5 PCA has a substantial interest in Pacific Power's petition for an order to defer the costs and benefits associated with repowering the Leaning Juniper wind facility, which the Company filed on September 6, 2019. As Pacific Power's largest customer in Washington, PCA could be substantially and directly affected by the Company's proposed deferral. Thus, PCA

requests leave to intervene in this Docket to represent its interests which are directly affected by Pacific Power's request.

6 PCA's legal counsel and expert have extensive experience in proceedings before the Commission involving Pacific Power tariffs, rules, and rate schedules. PCA, through Boise, has participated in numerous Company proceedings, and most recently in UE-152253, UE-161204, UE-170717, UE-180778, UE-181042, and UE-190458. PCA'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.

7 As described above, PCA 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. Thus, it is in the public interest to allow PCA to intervene in this proceeding.

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

Dated this 20th day of September, 2019.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

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