**BEFORE THE**

# WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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| WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,  Complainant,  v.  PUGET SOUND ENERGY,  Respondent. | )  )  )  )  )  )  )  )  )  )  ) | DOCKET NO. UE-161123  PETITION TO INTERVENE OF THE INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES |

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:

Industrial Customers of Northwest Utilities

818 SW 3rd Avenue #266

Portland, OR 97204

1. 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 attorney at the following address:

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

1. The administrative rules at issue are WAC § 480-07-340, -355.
2. 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.
3. ICNU’s member companies have a substantial interest in PSE’s proposed electric Schedule No. 451: Large Customer Retail Wheeling, which PSE filed on October 7, 2016. The Company’s proposed tariff revisions could substantially and directly affect ICNU members who purchase power from PSE. Accordingly, ICNU requests leave to intervene in this proceeding to represent its members who would be affected by any change to PSE’s rates.
4. 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. ICNU’s participation will not unnecessarily broaden the issues or burden the record in this proceeding. Thus, it is in the public interest to allow ICNU to intervene in this proceeding.
5. WHEREFORE, ICNU respectfully petitions the Commission for leave to intervene in this proceeding.

Dated this 18th day of October, 2016.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

*/s/ 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

\*Amcor Rigid Plastics

Axiall, Inc.

\*Boeing

Boise Cascade, LLC

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 PSE Customers*