

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

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

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

2 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:

Tyler C. Pepple
Davison Van Cleve, P.C.
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3 The administrative rules at issue are WAC § 480-07-340, -355.

4 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.

5 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.

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. 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.

7 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.



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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
*Ampcor 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*