

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,)	DOCKET NO. UE-080220
)	
Complainant,)	PETITION TO INTERVENE OF THE
)	INDUSTRIAL CUSTOMERS OF
)	NORTHWEST UTILITIES
v.)	
)	
PACIFICORP d/b/a PACIFIC POWER & LIGHT COMPANY,)	
)	
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:

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:

Melinda J. Davison
Irion Sanger
Davison Van Cleve, P.C.
333 S.W. Taylor, Suite 400
Portland, OR 97204
E-Mail: ias@dvclaw.com
Telephone: (503) 241-7242
Facsimile: (503) 241-8160

Randall J. Falkenberg
RFI Consulting, Inc.
8343 Roswell Road
PMB 362
Sandy Springs, GA 30350
E-Mail: consultrfi@aol.com
Telephone: (770) 379-0505
Facsimile: (770) 671-1046

2 The administrative rules 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. Some members of ICNU purchase power from PacifiCorp in
Washington, as indicated on Attachment A, and represent some of PacifiCorp's largest
customers.

4 On February 6, 2008, PacifiCorp filed an application to raise its prices for
Washington electric customers. PacifiCorp proposed to increase base rates for industrial
customers by 17.3%, and to increase industrial customer rates an additional 1.3% to
amortize deferred hydro costs for a total average industrial increase of 18.6%. ICNU's
member companies have a substantial interest in PacifiCorp's proposed rate increase
because the proposed rate change would result in rate shock. ICNU requests leave to
intervene in this Docket to represent its members who are affected by the proposed rate
increase.

5 ICNU has extensive experience involving PacifiCorp's rates. ICNU
participated in PacifiCorp's most recent rate cases, including UE-991832, UE-032065,
UE-050684, UE-060669, and UE-061546. ICNU's intervention in this proceeding will

PAGE 2 – PETITION TO INTERVENE OF ICNU

assist the Commission in resolving the issues and will not unreasonably broaden the issues, burden the record, or delay this proceeding.

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. 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 19th day of February 2008.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Melinda J. Davison

Melinda J. Davison

Irion Sanger

333 S.W. Taylor, Suite 400

Portland, Oregon 97204

(503) 241-7242 telephone

(503) 241-8160 facsimile

mail@dvclaw.com

Of Attorneys for Industrial Customers
of Northwest Utilities

ATTACHMENT A
INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

Air Liquide
Air Products
Amcort PET Packaging USA, Inc.
Certain Teed Gypsum & Ceiling Manufacturing, Inc.
Blue Heron Paper Company
Boeing
*Boise Cascade
ConAgra Foods
Dyno Nobel, Inc.
Eka Chemicals, Inc.
Emerald Kalama Chemical, LLC
Evanite Fiber
Evraz Oregon Steel Mills
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
PCC Structurals, Inc.
Ponderay Newsprint Co.
REC Silicon
Shell Oil Products US
Simpson Paper & Timber
SP Newsprint
Tesoro Refining and Marketing Co.
Wah Chang
West Linn Paper Company
*Weyerhaeuser

**Denotes PacifiCorp Customers in the State of Washington*