

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of)	DOCKET NO. UE-040611
)	
AVISTA CORPORATION)	
)	PETITION TO INTERVENE OF THE
Energy Recovery Mechanism (ERM) annual)	INDUSTRIAL CUSTOMERS OF
filing to review deferrals for calendar year)	NORTHWEST UTILITIES
2003)	
)	
)	
_____)	

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-referenced Docket, as an intervenor with full party status as described in WAC § 480-07-340. The business address of ICNU is:

Ken Canon
Executive Director
Industrial Customers of Northwest Utilities
825 NE Multnomah, Suite 180
Portland, OR 97232

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 address:

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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 Avista Corporation, as
indicated on Attachment A.

4 ICNU's member companies have a substantial interest in Avista's filing to
review deferrals for calendar year 2003. ICNU participated in Avista's 2002 Energy
Recovery Mechanism proceeding, Docket No. UE-030751. The determinations made in
this proceeding regarding Avista's 2003 deferrals may substantially and directly affect
ICNU's members who purchase power from Avista. ICNU requests leave to intervene in
this Docket to represent its members who will be affected by the outcome of this
proceeding.

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.

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

Dated in Portland, Oregon, this 22nd day of April, 2004.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

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ATTACHMENT A
INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

Air Liquide
Air Products
BPB Gypsum, Inc.
Blue Heron Paper Company
Boeing
Boise Cascade*
CNC Containers, Northwest
Chemi-Con Materials Corporation
Dyno Nobel, Inc.
ConAgra Foods
Eka Chemicals, Inc.
Evanite Fiber
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
Noveon Kalama, Inc.
Oregon Steel Mills
PCC Structural, Inc.
Pioneer Americas LLC
Ponderay Newsprint Co
Shell Oil Products US
Simpson Paper
Simpson Timber
Solar Grade Silicon LLC
Tesoro Refining and Marketing Co.
Wah Chang
West Linn Paper Company
Weyerhaeuser

**Denotes Avista Customers*