

**BEFORE THE**

**WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Application of Avista ) DOCKET NO. UE-060273  
Corporation d/b/a Avista Utilities for an )  
Order Approving a Corporate )  
Reorganization To Create a Holding ) PETITION TO INTERVENE OF THE  
Company, AVA Formation Corp. ) INDUSTRIAL CUSTOMERS OF  
 ) NORTHWEST UTILITIES

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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:

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

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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. ICNU represents some of Avista's largest customers.

4 ICNU's member companies have a substantial interest in Avista's  
proposed corporate reorganization to create a holding company. The proposed changes  
would substantially and directly affect those ICNU members who purchase power from  
Avista. ICNU requests leave to intervene in this Docket to represent its members who  
are affected by the proposal.

5 ICNU has extensive experiences involving Avista. ICNU participated in  
Avista's most recent rate cases and ERM cases, including UE-991606, UE-011029, UE-  
011595, UE-030751, UE-050482, and UE-060181. ICNU'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.

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.

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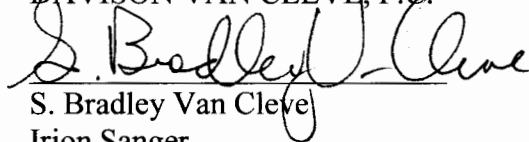
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WHEREFORE, ICNU respectfully petitions the Commission for leave to intervene in this proceeding.

Dated in Portland, Oregon, this 29th day of June, 2006.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.



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Of Attorneys for Industrial Customers  
of Northwest Utilities

**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 Structurals, Inc.  
Ponderay Newsprint Co  
Shell Oil Products US  
Simpson Paper  
Simpson Timber  
Solar Grade Silicon LLC  
SP Newsprint Co.  
Tesoro Refining and Marketing Co.  
Wah Chang  
West Linn Paper Company  
Weyerhaeuser

*\* Denotes Avista Customers*