

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,	)	DOCKET NO. UE-050684
	)	
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:

Ken Canon  
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: [mail@dvclaw.com](mailto:mail@dvclaw.com)  
Telephone: (503) 241-7242  
Facsimile: (503) 241-8160

Randall J. Falkenberg  
RFI Consulting, Inc.  
8351 Roswell Road  
PMB 362  
Atlanta, GA 30350  
E-Mail: [consultrfi@aol.com](mailto: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. Many members of ICNU purchase power from PacifiCorp, as indicated  
on Attachment A, and represent some of PacifiCorp's largest customers.

4 ICNU's member companies have a substantial interest in PacifiCorp's  
proposed rate increase. The proposed rate change would substantially and directly affect  
those ICNU members who purchase power from PacifiCorp. 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 and UE-  
032065. 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

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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 in Portland, Oregon, this 31st day of May, 2005.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

*M. Davison / by SRH*

Melinda J. Davison

Irion Sanger

Davison Van Cleve, P.C.

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

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DAVISON VAN CLEVE, P.C.  
333 S.W. Taylor, Suite 400  
Portland, OR 97204  
Telephone: (503) 241-7242

**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.  
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 PacifiCorp Customers in Washington*