

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND	)	DOCKET NO. UE-090134
TRANSPORTATION COMMISSION,	)	
	)	PETITION TO INTERVENE OF THE
Complainant,	)	INDUSTRIAL CUSTOMERS OF
	)	NORTHWEST UTILITIES
v.	)	
	)	
AVISTA CORPORATION d/b/a AVISTA	)	
UTILITIES,	)	
	)	
Respondent.	)	

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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:

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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. ICNU represents some of Avista's largest customers.

4                   ICNU's member companies have a substantial interest in Avista's  
proposed rate increase. The proposed rate change 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 Avista's proposals.

5                   ICNU has extensive experiences involving Avista's rates. ICNU  
participated in Avista's most recent rate cases and ERM cases, including UE-991606,  
UE-011029, UE-011595, UE-030751, UE-050482, UE-060181, UE-061411, UE-070804,  
UE-070623, and UE-080416. 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.

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

Dated in Portland, Oregon, this 10th day of February, 2009.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ S. Bradley Van Cleve

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Of Attorneys for Industrial Customers  
of Northwest Utilities

**ATTACHMENT A**  
**INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES**

Air Liquide  
Air Products  
Amcor PET Packaging USA, Inc. (CNC Containers Northwest)  
Certain Teed Gypsum & Ceiling Manufacturing, Inc. (BPB)  
Blue Heron Paper Company  
Boeing  
Boise Paper  
ConAgra Foods  
Dyno Nobel, Inc.  
Eka Chemicals, Inc.  
Emerald Performance Materials, LLC  
Equa-Chlor, LLC  
Evanite Fiber  
Evraz Oregon Steel Mills  
Freres Lumber Company  
Georgia-Pacific  
Grays Harbor Paper, L.P.  
Hewlett-Packard  
Inland Empire Paper Co.  
Intel  
International Paper  
J.R. Simplot  
Kimberly-Clark Corporation  
Linde, Inc.  
Longview Fibre  
Microsoft Corporation  
Norpac Foods  
PCC Structurals, Inc.  
Ponderay Newsprint  
REC Solar Grade Silicon LLC  
Shell Oil Products US  
Simpson Paper & Timber  
SP Newsprint  
Tesoro Refining and Marketing Co.  
Wah Chang  
West Linn Paper Company  
Weyerhaeuser