

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of)	DOCKET NO. UE-031471
)	
PUGET SOUND ENERGY, INC.,)	
)	PETITION TO INTERVENE OF THE
Petition for Authorization to Defer Certain)	INDUSTRIAL CUSTOMERS OF
Costs Related to the Company's Power Cost)	NORTHWEST UTILITIES
Only Rate Filing.)	
)	
_____)	

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 attorney at the following address:

S. Bradley Van Cleve
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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 Puget Sound Energy, Inc.
("PSE"), as indicated on Attachment A.

4 ICNU's member companies have a substantial interest in PSE's Petition
for Authorization to Defer Certain Costs Related to the Company's Power Cost Only Rate
Filing. ICNU participated in the Power Cost Only Rate Case, Docket No. UE-031725.
The proposed deferral may substantially and directly affect ICNU's members who
purchase power from PSE. ICNU requests leave to intervene in this Docket to represent
its members who are affected by the proposed deferral.

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.

PAGE 2 – PETITION TO INTERVENE OF ICNU

7

Finally, good cause exists to grant ICNU's Petition to Intervene despite the fact that the Commission first considered this matter at the March 31, 2004 regular public meeting. First, the Commission has continued this matter to the April 28, 2004 public meeting. ICNU's intervention will have no impact on this continuance. Second, Commission Staff has recommended that the Commission deny PSE's petition. ICNU supports the Staff recommendation and may provide additional evidence to assist the Commission in reaching a decision. Finally, no other customer group has submitted a petition to intervene in this proceeding. Thus, ICNU will provide the perspective of PSE's customers on the petition. For all of these reasons, good cause exists to grant ICNU's Petition to Intervene.

8

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

Dated in Portland, Oregon, this 8th day of April, 2004.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

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PAGE 3 – PETITION TO INTERVENE OF ICNU

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
Coastal St. Helens Chemical
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.
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 PSE Customers*