## **BEFORE THE**

## WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Investigation of	DOCKET UE-200069
AVISTA CORPORATION d/b/a AVISTA UTILITIES, PUGET SOUND ENERGY, and PACIFICORP d/b/a PACIFIC POWER & LIGHT COMPANY	) ) ) PETITION TO INTERVENE OF ) PACKAGING CORPORATION OF ) AMERICA
Regarding the 2020 Colstrip Coal Supply Agreement.	) ) )

Pursuant to WAC § 480-07-355, Packaging Corporation of America ("PCA")

hereby petitions the Washington Utilities and Transportation Commission ("WUTC" or

"Commission") for leave to intervene in the above-referenced dockets as an intervenor with full

party status, as described in WAC § 480-07-340. The business address for PCA is:

Patrick Loupin Corporate Manager – Energy Packaging Corporation of America 101 South Capitol Blvd., Suite 800 Boise, ID 83702 PatrickLoupin@PackagingCorp.com

PCA will be represented in this proceeding by Davison Van Cleve, P.C ("DVC").

All documents relating to this proceeding should be served on PCA's attorneys and independent

consultant at the following addresses:

Tyler C. Pepple Davison Van Cleve, P.C. 1750 SW Harbor Way, Suite 450 Portland, OR 97201 tcp@dvclaw.com Telephone: (503) 241-7242 Attorney for PCA Bradley G. Mullins 10147 Moratac Drive Tualatin, OR 97062 brmullins@mwanalytics.com Telephone: (503) 841-1465 Consultant for PCA

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Curt Ledford Davison Van Cleve, P.C. 1750 SW Harbor Way, Suite 450 Portland, OR 97201 crl@dvclaw.com Telephone: (503) 241-7242 Attorney for PCA Corinne O. Milinovich Davison Van Cleve, P.C. 1750 SW Harbor Way, Suite 450 Portland, OR 97201 com@dvclaw.com Telephone: (503) 241-7242 Attorney for PCA

PCA does not request paper service, unless required by WUTC rules or law. If permitted by the presiding officer, PCA also requests that electronic service be provided to the following:

Jesse O. Gorsuch jog@dvclaw.com Paralegal for DVC

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

PCA manufactures and distributes paper products in the United States, including

sheet papers, containerboard and corrugated containers, and market pulp. PCA is Pacific Power

& Light Company's ("Pacific Power" or the "Company") largest customer in Washington,

purchasing both power and power delivery services at its mill in Wallula, Washington.

On January 30, 2020, Commission Staff filed its petition requesting that the

Commission initiate an investigation into "(1) the prudency of the increased costs in connection

with the new coal supply agreement at Colstrip Units 3 and 4; and (2) the allocation of costs and

benefits associated with Owners' plan to apply pre-combustion additives to coal burned at Units

3 and 4 in order to qualify for a Production Tax Credit." As Pacific Power's largest customer,

PCA could be substantially and directly affected by the outcome of this proceeding.

Accordingly, PCA requests leave to intervene in this proceeding to represent its interests which are directly affected by Commission Staff's petition.

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As described above, PCA 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. Thus, it is in the public

interest to allow PCA to intervene in this proceeding.

WHEREFORE, PCA respectfully petitions the Commission for leave to intervene

in this proceeding.

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Dated this 25th day of February, 2020.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

<u>/s/Tyler C. Pepple</u> Tyler C. Pepple, WSBA # 50475 Curt R. Ledford, Nevada State Bar # 9101 1750 SW Harbor Way, Suite 450 Portland, Oregon 97201 Telephone: (503) 241-7242 tcp@dvclaw.com crl@dvclaw.com Of Attorneys for Packaging Corporation of America

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