



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

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

4                   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.

5                   On January 30, 2020, Commission Staff filed its petition requesting that the Commission initiate an investigation into "(1) the prudence 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.

PAGE 2 – PETITION TO INTERVENE OF PCA

6

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.

7

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

Dated this 25th day of February, 2020.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

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