## BEFORE THE

## WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

) ) PACIFICORP D/B/A PACIFIC POWER & )	TUE-152253
)  PACIFICODE D/B/A BACIFIC DOWED & )	
LIGHT COMPANY, ) PETITIO	N TO INTERVENE OF BOISE PAPER, L.L.C.
Petition For a Rate Increase Based on a )	
Modified Commission Basis Report, Two- )	
Year Rate Plan, and Decoupling )	
Mechanism.	

Pursuant to WAC § 480-07-355, Boise White Paper, L.L.C. ("Boise") 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 Boise is:

Boise White Paper, L.L.C. 1955 West Field Court Lake Forest, IL 60045

Boise will be represented in this proceeding by Davison Van Cleve, P.C. All documents relating to this proceeding should be served on Boise's attorney and independent consultant at the following addresses:

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

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Boise manufactures and distributes paper products in the United States, including sheet papers, containerboard and corrugated containers, and market pulp. Boise is Pacific Power & Light's ("Pacific Power" or the "Company") largest customer in Washington, purchasing both power and power delivery services at its mill in Wallula, Washington. Boise is a member of the Industrial Customers of Northwest Utilities ("ICNU"), which has been a party to many proceedings before the Commission involving Pacific Power. Boise was a party to Pacific Power's most recent general rate case (UE-140762).

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Boise has a substantial interest in Pacific Power's proposed rate increases. Pacific Power is proposing annual rate increases totaling approximately \$20.3 million, amounting to consecutive yearly increases of 2.99% in both 2016 and 2017 for Boise. These increases have been proposed by means of an expedited rate filing and multi-year rate plan and are attributable, in material part, to pro forma capital additions, claims of earnings attrition, and the use of end-of-period rate base—all issues which have been subject to significant contest in recent years before this Commission. The proposed rate change would substantially and directly affect Boise. Thus, Boise requests leave to intervene in this Docket to represent its interests which are directly affected by Pacific Power's proposed rate increases.

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Boise's legal counsel and experts have extensive experience in proceedings before the Commission involving Pacific Power's rates. Boise, both itself and as a member of ICNU, participated in the Company's most recent general rate cases, including UE-991832, UE-032065, UE-050684, UE-060669, UE-061546, UE-080220, UE-090205, UE-100749, UE-111190, UE-130043, and UE-140762. Boise's intervention in this proceeding will assist the Commission

<sup>1/</sup> ICNU is an incorporated, non-profit association of large industrial electric customers in the Pacific Northwest.

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in resolving the issues and will not unreasonably broaden the issues, burden the record, or delay this proceeding.

As described above, Boise 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 Boise to intervene in this proceeding.

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

Dated this 2nd day of December, 2015.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

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