

BEFORE THE

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND) DOCKET NO. UE-080416
TRANSPORTATION COMMISSION,)
)
Complainant,) PETITION TO INTERVENE OF THE
) INDUSTRIAL CUSTOMERS OF
) NORTHWEST UTILITIES
v.)
)
AVISTA CORPORATION d/b/a AVISTA)
UTILITIES,)
)
Respondent.)

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:

S. Bradley Van Cleve
Irion Sanger
Davison Van Cleve, P.C.
333 S.W. Taylor, Suite 400
Portland, OR 97204
bvc@dvclaw.com
ias@dvclaw.com
Telephone: (503) 241-7242
Facsimile: (503) 241-8160

Donald W. Schoenbeck
RCS, Inc.
900 Washington Street
Suite 780
Vancouver, WA 98660
E-Mail: dws@r-c-s-inc.com
Telephone: (503) 232-6155
Facsimile: (360) 737-7628

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,
and UE-070623. 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

PAGE 2 – PETITION TO INTERVENE OF ICNU

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 17th day of March, 2008.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Irion A. Sanger

S. Bradley Van Cleve

Irion A. Sanger

333 S.W. Taylor, Suite 400

Portland, Oregon 97204

(503) 241-7242 telephone

(503) 241-8160 facsimile

bvc@dvclaw.com

ias@dvclaw.com

Of Attorneys for Industrial Customers
of Northwest Utilities

ATTACHMENT A
INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

Air Liquide
Air Products
Amcort PET Packaging USA, Inc.
Certain Teed Gypsum & Ceiling Manufacturing, Inc.
Blue Heron Paper Company
Boeing
*Boise Cascade, LLC
ConAgra Foods
Dyno Nobel, Inc.
Eka Chemicals, Inc.
Emerald Kalama Chemical, LLC
Evanite Fiber
Evraz Oregon Steel Mills
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
PCC Structurals, Inc.
Ponderay Newsprint Co.
REC Silicon
Shell Oil Products US
Simpson Paper & Timber
SP Newsprint
Tesoro Refining and Marketing Co.
Wah Chang
West Linn Paper Company
Weyerhaeuser

**Denotes Avista Customers*