

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND)	DOCKET UE-191024
TRANSPORTATION COMMISSION,)	
)	
Complainant,)	PETITION TO INTERVENE OF
)	PACKAGING CORPORATION OF
v.)	AMERICA
)	
PACIFICORP DBA PACIFIC POWER &)	
LIGHT COMPANY,)	
)	
Respondent.)	
_____)	

1 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 docket as an intervenor with full party status, as described in WAC § 480-07-340. The business address for PCA is:

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2 PCA will be represented in this proceeding by Davison Van Cleve, P.C. All documents relating to this proceeding should be served on PCA through its designated representative above, as well as on PCA’s attorneys and independent consultants, respectively, at the following addresses:

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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:

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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. PCA is a

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party to the Company's current power cost adjustment proceeding, Docket UE-190458, and was a party to the Company's last limited issue rate case, Docket UE-152253.

5 PCA has a substantial interest in Pacific Power's 2021 General Rate Case ("GRC"), in which the Company is requesting an increase in revenues of approximately \$3.1 million from Washington operations. As Pacific Power's largest Washington customer, PCA could be substantially and directly affected by the outcome of this proceeding. Thus, PCA requests leave to intervene in this Docket to represent its interests which are directly affected by Pacific Power's GRC.

6 PCA's legal counsel and experts have extensive experience in proceedings before the Commission involving Pacific Power tariffs, rules, and rate schedules. PCA has participated in numerous Company proceedings, most recently in UE-140762, U-151958, UE-152253, UE-161204, UE-170717, UE-180778, UE-181042, and UE-190458. PCA'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.

7 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.

Dated this 6th day of January, 2020.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

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