BEFORE THE

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND) DOCKET NO. UE-120700
TRANSPORTATION COMMISSION,)
)
Complainant,)
) PETITION TO INTERVENE OF BOISE
v.) WHITE PAPER, LLC
)
PACIFICORP D/B/A PACIFIC POWER &)
LIGHT COMPANY,)
)
Respondent.)

Pursuant to WAC § 480-07-355, Boise White Paper, LLC ("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:

Scott Blickenstaff Boise White Paper, LLC 1111 W. Jefferson Street PO Box 50 Boise, ID 83728

Boise will be represented in this proceeding by Davison Van Cleve, P.C. All documents relating

to these proceedings should also be served on Boise's attorneys and consultant at the following

addresses:

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DAVISON VAN CLEVE, P.C. 1300 SW Fifth Avenue, Suite 2915 Portland, OR 97201 Telephone (503) 241-7242 Melinda J. Davison Donald W. Schoenbeck Irion Sanger RCS. Inc. Davison Van Cleve, P.C. 900 Washington St, Suite 780 Vancouver, WA 98660 333 S.W. Taylor, Suite 400 Portland, OR 97204 E-Mail: dws@r-c-s-inc.com mjd@dvclaw.com Telephone: (503) 232-6155 ias@dvclaw.com Facsimile: (360) 737-7628 Telephone: (503) 241-7242 Facsimile: (503) 241-8160

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

Boise is Pacific Power & Light's ("PacifiCorp" or the "Company") largest and longtime customer in Washington, purchasing both power and power delivery services. Boise has been a member of the Industrial Customers of Northwest Utilities ("ICNU"),^{1/} and as a member of ICNU, Boise's interests have been represented in many proceedings before the Commission involving PacifiCorp, including PacifiCorp's most recent general rate case (UE-111190).

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On May 15, 2012, PacifiCorp filed a proposed tariff sheet revision to Schedule 191 to adjust its System Benefits Charge ("SBC"). PacifiCorp's SBC collection rate was set in Docket UE-091516 at approximately \$8.8 million per year, or about 2.8% of its electric revenues in Washington. Boise and its affiliates have a substantial interest in PacifiCorp's proposed rate increase of approximately \$2.6 million, bringing the annual collection to \$11.4 million, or 3.6%. The proposed rate change would substantially and directly affect Boise. Therefore, Boise requests leave to intervene in this Docket.

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

Through ICNU, Boise has extensive experience in proceedings before the Commission involving PacifiCorp's rates, particularly PacifiCorp's most recent general rate cases, including UE-991832, UE-032065, UE-050684, UE-060669, UE-061546, UE-080220, UE-090205, UE-100749, and UE-111190. Boise'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.

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.

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

Dated in Portland, Oregon, this 11th day of June, 2012.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

<u>/s/ Melinda J. Davison</u> Melinda J. Davison Irion A. Sanger 333 S.W. Taylor, Suite 400 Portland, Oregon 97204 (503) 241-7242 telephone (503) 241-8160 facsimile mjd@dvclaw.com ias@dvclaw.com Of Attorneys for Boise White Paper, LLC

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