

BEFORE THE

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND)	DOCKET NO. UE-110876
TRANSPORTATION COMMISSION,)	
)	PETITION TO INTERVENE OF THE
Complainant,)	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
 1300 SW 5th Ave, Suite 1750
 Portland, OR 97201

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:

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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,
UE-070623, and UE-080416. 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

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 10th day of June, 2011.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

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of Northwest Utilities

INDUSTRIAL
CUSTOMERS OF
NORTHWEST
UTILITIES

MICHAEL B. EARLY
EXECUTIVE DIRECTOR

ATTACHMENT A
MEMBERS OF INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

Air Liquide
Air Products
Ampcor Rigid Plastics
Certain Teed Gypsum
Boeing
*Boise Cascade LLC
Boise Paper
ConAgra Foods
Dyno Nobel, Inc.
Eka Chemicals, Inc.
Emerald Performance Materials, LLC
Equa-Chlor, LLC
Evraz, Inc.
Freres Lumber Co.
Georgia-Pacific
Hewlett-Packard
*Inland Empire Paper Co.
Intel
International Paper
*JR Simplot
Kimberly-Clark Corporation
Linde, Inc.
Longview Fibre
Microsoft Corporation
Norpac Foods
Ponderay Newsprint Company
PCC Structurals, Inc.
REC Solar Grade Silicon LLC
SP Newsprint
Shell Oil Products US
Simpson Paper & Timber
Tesoro Refining and Marketing Co..
Timber Products Company
Wah Chang
West Linn Paper Company
Weyerhaeuser

**Denotes Avista Customers*