**BEFORE THE**

# WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

|  |  |  |
| --- | --- | --- |
| In the Matter of the Petition ofPACIFICORP d/b/a PACIFIC POWER &.LIGHT COMPANYPetition for an Order Approving Deferral ofCosts Related to Declining Hydro Generation | ))))))))) | DOCKET NO. UE-140094PETITION TO INTERVENE OF PACKAGING CORPORATION OF AMERICA |

1. Pursuant to WAC § 480-07-355, Packaging Corporation of America, f/k/a Boise White Paper, L.L.C. (“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 of PCA is:

Packaging Corporation of America
1111 W. Jefferson Street

PO Box 50

Boise, ID 83728

1. PCA will be represented in this proceeding by Davison Van Cleve, P.C. All documents relating to these proceedings should also be served on PCA’s attorneys at the following address:

Melinda J. Davison

Tyler C. Pepple

Davison Van Cleve, P.C.

333 S.W. Taylor, Suite 400

Portland, OR 97204

mjd@dvclaw.com

tcp@dvclaw.com

Telephone: (503) 241-7242

Facsimile: (503) 241-8160

1. The administrative rules at issue are WAC § 480-07-340, -355.
2. PCA is Pacific Power & Light’s (“PacifiCorp” or the “Company”) largest customer in Washington, purchasing both power and power delivery services at its mill in Wallula, Washington. PCA was a party to PacifiCorp’s most recent general rate case (UE-130043).
3. PCA has a substantial interest in PacifiCorp’s request to defer for later recovery in rates costs associated with declining hydro generation. PacifiCorp estimates that it will incur, on a total-Company basis, approximately $15 million in increased power costs in 2014 as a result of low hydro conditions. The inclusion of these costs in rates would substantially and directly affect PCA. PCA requests leave to intervene in this Docket to represent its interests which are directly affected by PacifiCorp’s deferred accounting proposal.
4. PCA’s legal counsel has extensive experience in proceedings before the Commission involving PacifiCorp’s rates. PCA directly participated in PacifiCorp’s most recent general rate case and has participated, as a member of the Industrial Customers of Northwest Utilities, in other PacifiCorp rate proceedings, including UE-991832, UE-032065, UE-050684, UE-060669, UE-061546, UE-080220, UE-090205, UE-100749, and UE 111190. 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.
5. 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. It is in the public interest to allow PCA to intervene in this proceeding.
6. WHEREFORE, PCA respectfully petitions the Commission for leave to intervene in this proceeding.

Dated this 20th day of March, 2014.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

*/s/ Tyler C. Pepple*

Melinda J. Davison

Tyler C. Pepple

333 S.W. Taylor, Suite 400

Portland, Oregon 97204

(503) 241-7242 telephone

(503) 241-8160 facsimile

mjd@dvclaw.com

tcp@dvclaw.com

Of Attorneys for Packaging Corporation of America