**BEFORE THE**

# WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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| In the Matter of the Petition of:  Sierra Club, Climate Solutions, and  Washington Environmental Council  For an Adjudicatory Proceeding Relating  to the Prudency of Continued Investments  in Colstrip Plant Units 1 and 2. | )  )  )  )  )  )  )  )  ) | DOCKET UE-151592  PETITION TO INTERVENE OF  THE INDUSTRIAL CUSTOMERS OF  NORTHWEST UTILITIES |

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:

Industrial Customers of Northwest Utilities

818 SW 3rd Avenue #266

Portland, OR 97204

1. ICNU will be represented in this proceeding by Davison Van Cleve, P.C. All documents relating to this proceeding should be served on ICNU’s attorney and consultant at the following addresses:

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| --- | --- |
| Tyler C. Pepple  Davison Van Cleve, P.C.  333 S.W. Taylor, Suite 400  Portland, OR 97204  tcp@dvclaw.com  Telephone: (503) 241-7242  Facsimile: (503) 241-8160 | Bradley G. Mullins  333 S.W. Taylor, Suite 400  Portland, OR 97204  brmullins@mwanalytics.com  Telephone: (503) 954-2852  Facsimile: (503) 241-8160 |

1. The administrative rules at issue are WAC § 480-07-340, -355.
2. 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. Many members of ICNU purchase power from Puget Sound Energy (“PSE or the “Company”), as indicated on Attachment A.
3. ICNU has a substantial interest in this proceeding. Any Commission determination in this proceeding regarding the continued viability of PSE’s ownership in Colstrip Units 1 and 2 is likely to impact the rates the Company’s customers, including ICNU’s members, pay.
4. 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. Thus, it is in the public interest to allow ICNU to intervene in this proceeding.
5. WHEREFORE, ICNU respectfully petitions the Commission for leave to intervene in this proceeding.

Dated this 12th day of August, 2015.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

*/s/ Tyler C. Pepple*

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Of Attorneys for the Industrial Customers

of Northwest Utilities

**ATTACHMENT A**

## MEMBERS OF INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

\*Air Liquide

\*Air Products

AkzoNoebel

Alcoa

\*Amcor Rigid Plastics

Axiall, Inc.

\*Boeing

Boise Cascade, LLC

Boise Paper

Certain Teed Gypsum & Ceiling Manufacturing (BPB)

ConAgra Foods

Dyno Nobel, Inc.

Emerald Performance Materials, LLC

Evraz, Inc.

Freres Lumber Co.

\*Georgia-Pacific

Grant PUD Industries

Inland Empire Paper Co.

\*Intel Corp

\*International Paper

J.R. Simplot

Linde, Inc.

Longview Fibre

\*Microsoft Corporation

Norpac Foods

Northwest Hardwoods

Packaging Corporation of America

PCC Structurals, Inc.

Ponderay Newsprint

REC Solar Grade Silicon LLC

RockTenn

Schnitzer Steel

\*Shell Oil Products US

SP Fiber Technologies

\*Tesoro Refining and Marketing Co.  
Timber Products, Inc.

Wah Chang

West Linn Paper Company

\*Weyerhaeuser

*\*Denotes PSE Customers*