

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION	)	DOCKETS UE-200900 and UG-200901 ( <i>Consolidated</i> )
	)	
Complainant,	)	
	)	PETITION TO INTERVENE OF
v.	)	INLAND EMPIRE PAPER COMPANY
	)	
AVISTA CORPORATION d/b/a	)	
AVISTA UTILITIES	)	
	)	
Respondent.	)	

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1 Pursuant to WAC § 480-07-355, Inland Empire Paper Company (“Inland Empire”) hereby petitions the Washington Utilities and Transportation Commission (“WUTC” or “Commission”) for leave to intervene in the above-referenced dockets as an intervenor with full party status, as described in WAC § 480-07-340. The business address of Inland Empire is:

Inland Empire Paper Company  
3320 N. Argonne  
Millwood, WA 99212

2 Inland Empire will be represented in this proceeding by Davison Van Cleve, P.C. (“DVC”). All documents relating to this proceeding should be served on Inland Empire’s attorneys at the following addresses:

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Inland Empire does not request paper service, unless required by WUTC rules or law. If permitted by the presiding officer, Inland Empire also requests that electronic service be provided to the following:

Jesse O. Gorsuch  
jog@dvclaw.com  
Paralegal for DVC

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

4 Inland Empire is a manufacturer of high-quality newsprint and specialty paper products, with headquarters in Millwood, Washington. Inland Empire is Avista Corporation's ("Avista" or the "Company") largest electric customer, and also takes natural gas transportation service from Avista.

5 On October 29, 2020, the Company filed its proposed electric and natural gas rate increases of \$44.2 million, or 8.3%, in electric base revenues, and \$12.8 million, or 12.2%, in natural gas base revenues. As a purchaser of electricity and natural gas services from Avista, Inland Empire would be substantially and directly affected by the Company's proposed rate changes. In addition, as noted in the Direct Testimony of Avista witness Joseph D. Miller,<sup>1/</sup> and as required by the Partial Multiparty Settlement Stipulation approved by the Commission in Order 09 in Docket Nos. UE-190334, UG-190335, and UE-190222 (Consolidated),<sup>2/</sup> Inland Empire is in the process of negotiating a potential special contract with Avista. If Inland Empire and Avista agree on the terms of a special contract, Inland Empire and Avista will request Commission approval of the special contract in this general rate case. Inland Empire therefore

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<sup>1/</sup> Exh. JDM-1T at 28:16-29:17.

<sup>2/</sup> Multiparty Settlement Stipulation ¶ 14(i).

requests leave to intervene in these dockets to represent and protect its interests, which would be affected by any changes to Avista's rates and programs.

6           Inland Empire's representatives in this proceeding have extensive experience in proceedings before the Commission involving Avista, including the Company's most recent general rate cases, Dockets UE-190334/UG-190335 and UE-170485/UG-170486, as well as Dockets UE-190222 and U-170970. Inland Empire's intervention in this proceeding will assist the Commission in resolving issues and will not unreasonably broaden the issues, burden the record, or delay this proceeding.

7           As described above, Inland Empire has a direct and substantial interest in this proceeding that will not be adequately represented by any other party, and Inland Empire may be affected by any Commission determination connected with this proceeding. Thus, it is in the public interest to allow Inland Empire to intervene in this proceeding.

8           WHEREFORE, Inland Empire respectfully petitions the Commission for leave to intervene in this proceeding.

Dated this 3rd day of December, 2020.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

*s/ Tyler C. Pepple*

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