

BEFORE THE

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION)	DOCKET NO. UE-031725
)	
)	
Complainant,)	PETITION TO INTERVENE OF THE
)	INDUSTRIAL CUSTOMERS OF
v.)	NORTHWEST UTILITIES
)	
PUGET SOUND ENERGY, INC.)	
)	
Respondent.)	
_____)	

1. The Industrial Customers of Northwest Utilities (“ICNU”) petitions the Washington Utilities and Transportation Commission (“WUTC” or “Commission”) for leave to intervene in the above-referenced Docket pursuant to WAC § 480-09-430, as an intervenor with full party status as described in WAC § 480-09-430(3).

2. The business address of ICNU is:

Ken Canon
Industrial Customers of Northwest Utilities
825 NE Multnomah, Suite 180
Portland, OR 97232

3. ICNU will be represented in this proceeding by Davison Van Cleve, P.C.

All documents relating to these proceedings should be served on ICNU’s attorneys and consultant at the following addresses:

S. Bradley Van Cleve
Matthew W. Perkins
Davison Van Cleve, P.C.
1000 SW Broadway, Ste. 2460
Portland, OR 97205
E-Mail: mail@dvclaw.com
Telephone: 503-241-7242
Facsimile: 503-241-8160

Donald W. Schoenbeck
Regulatory & Cogeneration Services, Inc.
900 Washington Street, Suite 1000
Vancouver, WA 98660
E-Mail: dws@keywaycorp.com
Telephone: 503-232-6155
Facsimile: 360-737-7628

4. 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 are customers of Puget Sound Energy, Inc. ("PSE"), including Air Liquide, Air Products, the Boeing Company, Equilon Enterprises LLC, Tesoro Northwest Company, CNC Containers and Weyerhaeuser.

5. ICNU's member companies have a substantial interest in PSE's proposed tariff revisions, which would directly affect PSE's Tariff Schedule 95, Power Cost Adjustment Mechanism. PSE seeks to raise its rates due to the cost of acquiring a 125 MW (approximate) share of the Frederickson 1 combined cycle-combustion turbine project, and various changes to the composition, cost and operation of PSE's existing power supply portfolio. The proposed rate change would substantially and directly affect ICNU's members. ICNU requests leave to intervene in this Docket to represent its members who are affected by the Power Cost Adjustment Mechanism.

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. ICNU, therefore, requests that the Commission grant its Petition to Intervene and make ICNU a party to this proceeding.

PETITION TO INTERVENE OF ICNU - PAGE 2

7. ICNU believes its participation in this proceeding will assist the Commission. Furthermore, ICNU's intervention in this proceeding will not unreasonably broaden the issues, burden the record, or delay this proceeding.

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

Dated this 4th day of November, 2003.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Matthew Perkins

S. Bradley Van Cleve

Matthew W. Perkins

Davison Van Cleve, P.C.

1000 SW Broadway, Suite 2460

Portland, Oregon 97205

(503) 241-7242 phone

(503) 241-8160 facsimile

mail@dvclaw.com

Of Attorneys for Industrial Customers of Northwest
Utilities

ATTACHMENT A
INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

Air Liquide*
Air Products*
BPB Gypsum, Inc.
Blue Heron Paper Company
Boeing*
Boise Cascade
CNC Containers, Northwest*
Chemi-Con Materials Corporation
Coastal St. Helens Chemical
ConAgra Foods
Eka Chemicals, Inc.
Evanite Fiber
Georgia-Pacific*
Grays Harbor Paper, L.P.
Hewlett-Packard
Inland Empire Paper Co.
Intel*
J.R. Simplot
Kimberly-Clark Corporation
Longview Fibre
Norpac Foods
Noveon Kalama, Inc.
Oregon Steel Mills
PCC Structural, Inc.
Pioneer Americas LLC
Ponderay Newsprint Co.
Shell Oil Products US*
Simpson Paper
Simpson Timber
Solar Grade Silicon LLC
Tesoro Refining and Marketing Co.*
Wah Chang
West Linn Paper Company
Weyerhaeuser*

**Denotes PSE Customers*