BEFORE THE

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Petition of) DOCKET NO. UE-031389
PUGET SOUND ENERGY, INC.	
FUGET SOUND ENERGY, INC.) PETITION TO INTERVENE OF THE
For Approval of 2003 Power Cost Adjustment) INDUSTRIAL CUSTOMERS OF
Mechanism Report) NORTHWEST UTILITIES

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 Irion A. Sanger Davison Van Cleve, P.C. 1000 SW Broadway, Ste. 2460 Portland, OR 97205 E-Mail: <u>mail@dvclaw.com</u> 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: <u>dws@keywaycorp.com</u> Telephone: 503-232-6155 Facsimile: 360-737-7628

PETITION TO INTERVENE OF ICNU - PAGE 1

DAVISON VAN CLEVE, P.C. 1000 SW Broadway, Suite 2460 Portland, OR 97205 Telephone: (503) 241-7242 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 Power Cost Adjustment Mechanism Annual Report for the twelve months ended June 30, 2003. ICNU's members' share of any power cost variability will be deferred and may impact some of ICNU's members' future rates. Some ICNU members are purchasing power from third parties pursuant to Schedule 449, and are not subject to the Power Cost Adjustment Mechanism; however, other ICNU members purchase pursuant to cost of service rates. In addition, some ICNU members who are on Schedule 449 also have smaller accounts that are on cost of service rate schedules. 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.

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.

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DAVISON VAN CLEVE, P.C. 1000 SW Broadway, Suite 2460 Portland, OR 97205 Telephone: (503) 241-7242 WHEREFORE, ICNU respectfully petitions the Commission for leave to

intervene in this proceeding.

Dated this 24th day of September, 2003.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

<u>/s/ Irion Sanger</u> S. Bradley Van Cleve Irion A. Sanger 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

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ATTACHMENT A INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

Agilent Technologies 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 Structurals. 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