**BEFORE THE**

# WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

|  |  |  |
| --- | --- | --- |
| WASHINGTON UITILITIES AND TRANSPORTATION COMMISSION Complainant, v.AVISTA CORPORATION  Respondent. | ))))))))))) | DOCKET UE-151148PETITION TO INTERVENE OF THE INDUSTRIAL CUSTOMERS OFNORTHWEST 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 attorneys and consultant at the following addresses:

|  |  |
| --- | --- |
| Melinda J. DavisonJesse E. CowellDavison Van Cleve, P.C.333 S.W. Taylor, Suite 400Portland, OR 97204mjd@dvclaw.comjec@dvclaw.comTelephone: (503) 241-7242Facsimile: (503) 241-8160 | Bradley G. Mullins333 S.W. Taylor, Suite 400Portland, OR 97204brmullins@mwanalytics.comTelephone: (503) 954-2852Facsimile: (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. ICNU represents some of Avista Corporation’s (“Avista” or the “Company”) largest customers.
3. ICNU’s member companies that take service from Avista have a substantial interest in Avista’s proposed revisions to its electric demand side management (“DSM”) tariff, Schedule 91, filed by the Company on May 29, 2015. The proposed rate change would substantially and directly affect those ICNU members who purchase power from Avista. In particular, ICNU is concerned that Schedule 25 customers may be contributing far more to Schedule 91 than could be justified by DSM benefits received. In order to investigate and address any such potential inequities, ICNU requests leave to intervene in this docket to represent its members who are affected by Avista’s proposed rate revision.
4. ICNU has extensive experience in proceedings before the Commission involving Avista. ICNU participated in Avista’s most recent rate cases and ERM cases, including UE-991606, UE-011029, UE-011595, UE-030751, UE-050482, UE-060181, UE-061411, UE-070804, UE-070623, UE-080416, UE-110876, UE-120436, UE-140188, and most recently in UE-150204. ICNU’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, 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.
6. WHEREFORE, ICNU respectfully petitions the Commission for leave to intervene in this proceeding.

Dated this 11th day of August, 2015.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

*/s/Jesse E. Cowell*

Melinda J. Davison

Jesse E. Cowell

333 S.W. Taylor, Suite 400

Portland, Oregon 97204

(503) 241-7242 telephone

(503) 241-8160 facsimile

mjd@dvclaw.com

jec@dvclaw.com

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 Avista Customers*