

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND	)	DOCKET UE-151148
TRANSPORTATION COMMISSION	)	
	)	
Complainant,	)	PETITION TO INTERVENE OF
	)	THE INDUSTRIAL CUSTOMERS OF
v.	)	NORTHWEST UTILITIES
	)	
AVISTA CORPORATION	)	
	)	
Respondent.	)	
	)	

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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 3<sup>rd</sup> Avenue #266  
Portland, OR 97204

2 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:

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

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.  
ICNU represents some of Avista Corporation's ("Avista" or the "Company") largest customers.

5 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.

6 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.

7 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.

PAGE 2 – PETITION TO INTERVENE OF ICNU

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.



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**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 Structural, 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*