## BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND	
TRANSPORTATION COMMISSION	) DOCKET NO. UE-050870
Complainant, v.	<ul> <li>PETITION TO INTERVENE OF THE</li> <li>INDUSTRIAL CUSTOMERS OF</li> <li>NORTHWEST UTILITIES</li> </ul>
PUGET SOUND ENERGY, INC.	)
Respondent.	)
	) _)

Pursuant to WAC § 480-07-355, 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, as an intervenor with full party status as described in WAC § 480-07-340. The business address of ICNU is:

Ken Canon Executive Director Industrial Customers of Northwest Utilities 333 S.W. Taylor, Suite 400 Portland, OR 97204

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:

PAGE 1 – PETITION TO INTERVENE OF ICNU

1

DAVISON VAN CLEVE, P.C. 333 S.W. Taylor, Suite 400 Portland, OR 97204 Telephone: (503) 241-7242 S. Bradley Van Cleve Matthew W. Perkins Davison Van Cleve, P.C. 333 S.W. Taylor Suite 400

Portland, OR 97204 E-Mail: mail@dvclaw.com

Telephone: 503-241-7242 Facsimile: 503-241-8160 Donald W. Schoenbeck Regulatory & Cogeneration

Services, Inc.

900 Washington Street

Suite 780

Vancouver, WA 98660 E-Mail: dws@r-c-s-inc.com Telephone: 503-232-6155 Facsimile: 360-737-7628

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

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 purchase power from Puget Sound Energy ("PSE"), as indicated on Attachment A.

ICNU's member companies have a substantial interest in PSE's proposed tariff revisions, which would directly affect PSE's Tariff Schedule 95. Through this Power Cost Only Rate Case, the Company is also seeking approval and recovery in rates of its acquisition of the Hopkins Ridge Project, a wind-powered electric generation facility currently under construction. The proposed rate change would substantially and directly affect those of ICNU's members who purchase power, transmission and distribution services from PSE. ICNU requests leave to intervene in this Docket to represent its members who are affected by the proposed rate increase.

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. ICNU participated in PSE's most recent rate cases, including the Company's previous

PAGE 2 – PETITION TO INTERVENE OF ICNU

DAVISON VAN CLEVE, P.C. 333 S.W. Taylor, Suite 400 Portland, OR 97204 Telephone: (503) 241-7242

2

4

5

Power Cost Only Rate Case (Docket No. UE-031725). 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.

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.

6

7

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

Dated in Portland, Oregon, this 16th day of June, 2005.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

O

S. Bradley Van Cleve Matthew W. Perkins

Davison Van Cleve, P.C.

333 S.W. Taylor, Suite 400

Portland, Oregon 97204

(503) 241-7242 telephone

(503) 241-8160 facsimile

mail@dvclaw.com

Of Attorneys for Industrial Customers

of Northwest Utilities

PAGE 3 – PETITION TO INTERVENE OF ICNU

## **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

Dyno Nobel, Inc.

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

Microsoft Corporation\*

Norpac Foods

Noveon Kalama, Inc.

Oregon Steel Mills

PCC Structurals, Inc.

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\*

<sup>\*</sup>Denotes PSE Customers