## **BEFORE THE**

## WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND	) DOCKET NO. UE-120436
TRANSPORTATION COMMISSION,	)
Complainant,	<ul> <li>) PETITION TO INTERVENE OF THE</li> <li>) INDUSTRIAL CUSTOMERS OF</li> <li>) NORTHWEST UTILITIES</li> </ul>
V.	)
AVISTA CORPORATION d/b/a AVISTA UTILITIES,	) ) )
Respondent.	)

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

ICNU will be represented in this proceeding by Davison Van Cleve, P.C. All documents relating to these proceedings should also be served on ICNU's attorneys and consultant at the following addresses:

PAGE 1 – PETITION TO INTERVENE OF ICNU

DAVISON VAN CLEVE, P.C. 333 S.W. Taylor, Suite 400 Portland, OR 97204 Telephone: (503) 241-7242 Melinda J. Davison Davison Van Cleve, P.C. 333 S.W. Taylor, Suite 400 Portland, OR 97204 mjd@dvclaw.com mail@dvclaw.com Telephone: (503) 241-7242 Facsimile: (503) 241-8160

4

5

6

Donald W. Schoenbeck RCS, Inc. 900 Washington St., 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. ICNU represents some of Avista's largest customers.

ICNU's member companies have a substantial interest in Avista's proposed rate increase. The proposed rate change would substantially and directly affect those ICNU members who purchase power from Avista, as Schedule 25 customers will experience a rate increase of 8.6%. ICNU requests leave to intervene in this Docket to represent its members who are affected by Avista's proposals.

ICNU has extensive experiences involving Avista's rates. 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, and most recently, UE-110876, which is still ongoing. 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.

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

## 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 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.

7

WHEREFORE, ICNU respectfully petitions the Commission for leave to

intervene in this proceeding.

Dated in Portland, Oregon, this 18th day of April, 2012.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

<u>/s/ Melinda J. Davison</u> Melinda J. Davison 333 S.W. Taylor, Suite 400 Portland, Oregon 97204 (503) 241-7242 telephone (503) 241-8160 facsimile mjd@dvclaw.com Of Attorneys for Industrial Customers of Northwest Utilities

PAGE 3 – PETITION TO INTERVENE OF ICNU

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

## ATTACHMENT A MEMBERS OF INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

Air Liquide Air Products **Amcor Rigid Plastics** Certain Teed Gypsum Boeing \*Boise Cascade LLC **Boise Paper ConAgra** Foods Dyno Nobel, Inc. Eka Chemicals, Inc. Emerald Performance Materials, LLC Equa-Chlor, LLC Evraz, Inc. Freres Lumber Co. Georgia-Pacific \*Inland Empire Paper Co. Intel **International Paper** \*JR Simplot Linde, Inc. Longview Fibre Microsoft Corporation Norpac Foods Ponderay Newsprint Company PCC Structurals, Inc. **REC Solar Grade Silicon LLC** SP Newsprint Shell Oil Products US Simpson Paper & Timber Tesoro Refining and Marketing Co.. **Timber Products Company** Wah Chang West Linn Paper Company Weyerhaeuser

\*Denotes Avista Customers