

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND)	DOCKET UE-150204
TRANSPORTATION COMMISSION)	
)	
Complainant,)	PETITION TO INTERVENE OF
)	THE INDUSTRIAL CUSTOMERS OF
v.)	NORTHWEST UTILITIES
)	
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

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 consultants at the following addresses:

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

Michael P. Gorman
Brubaker & Associates, Inc.
16690 Swingley Ridge Rd.
Suite 140
Chesterfield, MO 63017
E-Mail: mgorman@consultbai.com
Telephone: (636) 898-6725
Facsimile: (636) 898-6726

Bradley G. Mullins
Mountain West Analytics
333 S.W. Taylor, Suite 400
Portland, OR 97204
brmullins@mwanalytics.com
Facsimile: (503) 241-8160

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") largest customers.

5 ICNU's member companies that take service from Avista have a substantial
interest in Avista's proposed electric rate increase. The proposed rate change would
substantially and directly affect those ICNU members who purchase power from Avista. ICNU
requests leave to intervene in this docket to represent its members who are affected by Avista's
proposed rate increase.

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, and most recently in UE-140188.
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.

PAGE 2 – PETITION TO INTERVENE OF ICNU

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.

8

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

Dated this 10th day of February, 2015.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.



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
Ampcor 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*