

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Application of)	
)	
PUGET SOUND ENERGY, INC.)	DOCKET NO. UE 131230
)	
For an Order Authorizing the Sale of)	
Interests in the Development Assets)	PETITION TO INTERVENE OF THE
Required for the Construction and Operation)	INDUSTRIAL CUSTOMERS OF
of Phase II of the Lower Snake River Wind)	NORTHWEST UTILITIES
Facility)	
_____)	

1 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-captioned proceeding, 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 be served on ICNU’s attorneys and consultants at the following addresses:

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2 The administrative rules that this petition puts at issue are WAC §§ 480-07-
340, 480-07-355.

3 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.
Certain members of ICNU purchase power services from Puget Sound Energy (“PSE”), as
indicated on Attachment A. ICNU has been a party to many proceedings before the
Commission involving PSE, including PSE’s expedited rate filing, decoupling proceeding,
and current power cost only rate case.

4 ICNU’s member companies have a substantial interest PSE’s sale to PGE of
its interests in the development assets required for the construction and operation for Phase II
of the Lower Snake River Wind Facility. The proposed sale could impact the rates and
quality of service that PSE provides to ICNU’s members.

5 ICNU has extensive experience involving PSE’s rates. 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.

6 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. 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.

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

Dated in Portland, Oregon, this 15th day of July, 2013.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Irion A. Sanger

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Of Attorneys for Industrial Customers
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ATTACHMENT A
MEMBERS OF INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

*Air Liquide
*Air Products
*Ampcor Rigid Plastics
*Boeing
Boise Cascade, Inc.
Boise Paper
*Certain Teed Gypsum & Ceiling Manufacturing (BPB)
ConAgra Foods
Dyno Nobel, Inc.
Eka Chemicals, Inc.
Emerald Performance Materials
Evraz, Inc.
Freres Lumber Co.
*Georgia-Pacific
Grant PUD Industries
Inland Empire Paper Co.
*Intel
*International Paper
JR Simplot
Linde, Inc.
Longview Fibre
*Microsoft Corporation
Norpac Foods
North Pacific Paper Corp
Northwest Hardwoods
PCC Structural, Inc.
Ponderay Newsprint
PPG Industries Inc.
REC Solar Grade Silicon LLC
Schnitzer Steel
*Shell Oil Products US
Simpson Paper & Timber
SP Fiber Technologies
*Tesoro Refining and Marketing Co.
Timber Products
Wah Chang
West Linn Paper Company
*Weyerhaeuser

**Members served by Puget Sound Energy*