

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND)	
TRANSPORTATION COMMISSION,)	
)	
Complainant,)	DOCKET NO. UE-090205
)	
v.)	PETITION TO INTERVENE OF THE
)	INDUSTRIAL CUSTOMERS OF
PACIFICORP d/b/a PACIFIC POWER &)	NORTHWEST UTILITIES
LIGHT COMPANY,)	
)	
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:

Michael Early
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 also be served on ICNU’s attorneys and consultants at the following addresses:

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2 The administrative rules at issue are WAC §§ 480-07-340, -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. Some members of ICNU purchase power from PacifiCorp in
Washington, as indicated on Attachment A.

4 On February 9, 2009, PacifiCorp filed an application to raise its prices for
Washington electric customers. PacifiCorp's proposed increase is a total average
industrial increase of 15.1%, and a 19.9% increase for Industrial Customers. ICNU's
member companies have a substantial interest in PacifiCorp's proposed rate increase
because the proposed rate change would result in rate shock. ICNU requests leave to
intervene in this Docket to represent its members who are affected by the proposed rate
increase.

5 ICNU has extensive experience involving PacifiCorp's rates. ICNU
participated in PacifiCorp's most recent rate cases, including UE-991832, UE-032065,
UE-050684, UE-060669, UE-061546 and UE-080220. 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.

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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.

7

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

Dated this 19th day of February, 2009.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Irion A. Sanger

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Of Attorneys for Industrial Customers
of Northwest Utilities

ATTACHMENT A
INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

Air Liquide
Air Products
Amcor PET Packaging USA, Inc. (CNC Containers Northwest)
Certain Teed Gypsum & Ceiling Manufacturing, Inc. (BPB)
Blue Heron Paper Company
Boeing
Boise Cascade, LLC
*Boise Paper
ConAgra Foods
Dyno Nobel, Inc.
Eka Chemicals, Inc.
Emerald Performance Materials, LLC
Equa-Chlor, LLC
Evanite Fiber
Evraz, Inc.
Freres Lumber Co.
Georgia-Pacific
Grays Harbor Paper, L.P.
Hewlett-Packard
Inland Empire Paper Co.
Intel
International Paper
J.R. Simplot
Kimberly-Clark Corporation
Linde, Inc.
*Longview Fibre
Microsoft Corporation
Norpac Foods
PCC Structurals, Inc.
Ponderay Newsprint
REC Solar Grade Silicon LLC
Shell Oil Products US
Simpson Paper & Timber
SP Newsprint
Tesoro Refining and Marketing Co.
Wah Chang
West Linn Paper Company
*Weyerhaeuser

**Denotes PacifiCorp Customers in the State of Washington*