

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND)	DOCKET NO. UE-060181
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:

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. ICNU represents some of Avista’s largest customers.

4 ICNU’s member companies have a substantial interest in Avista’s
proposed changes to the Energy Recovery Mechanism (“ERM”). The proposed changes
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 the proposed rate increase.

5 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 and UE-050482. 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.

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

Dated in Portland, Oregon, this 16th day of February, 2006.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

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Of Attorneys for Industrial Customers
of Northwest Utilities

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 Structural, 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

* *Denotes Avista Customers*