

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION	)	DOCKET UE-160228
	)	
	)	
Complainant,	)	PETITION TO INTERVENE OF
	)	THE INDUSTRIAL CUSTOMERS OF
v.	)	NORTHWEST UTILITIES
	)	
AVISTA CORPORATION d/b/a	)	
AVISTA UTILITIES	)	
	)	
Respondent.	)	

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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 3<sup>rd</sup> 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 attorney and consultant at the following addresses:

Jesse E. Cowell	Bradley G. Mullins
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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" or the "Company") largest customers.

5 ICNU's member companies that take service from Avista have a substantial  
interest in Avista's proposed electric rate increase, filed by the Company on February 19, 2016.  
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 and  
take positions on behalf of 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 the Company's most recent rate 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, UE-140188, and most recently in  
UE-150204/UG-150205. 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.

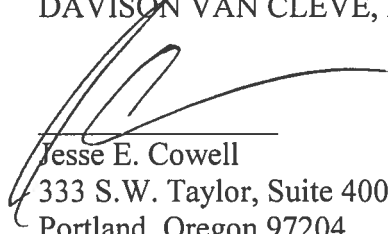
7 As described above, ICNU has a direct and substantial interest in this proceeding  
that will not be adequately represented by any other party, and may be affected by any  
Commission determination made in connection with this proceeding. Thus, it is in the public  
interest to allow ICNU to intervene in this proceeding.

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

Dated this 24th day of February, 2016.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.



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

Air Liquide  
Air Products  
AkzoNobel  
Alcoa  
Ampcor Rigid Plastics  
Axiall, Inc.  
Boeing  
\*Boise Cascade, LLC  
Boise Paper  
Certain Teed Gypsum & Ceiling Manufacturing (BPB)  
ConAgra Foods  
\*Darigold  
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  
Kapstone Kraft Paper  
Legacy Health  
Linde, Inc.  
Microsoft Corporation  
Norpac Foods  
Northwest Hardwoods  
Packaging Corporation of America  
PCC Structurals, Inc.  
Ponderay Newsprint  
REC Solar Grade Silicon LLC  
Schnitzer Steel  
Shell Oil Products US  
Tesoro Refining and Marketing Co.  
Timber Products, Inc.  
Wah Chang  
WestRock  
West Linn Paper Company  
Weyerhaeuser

*\*Denotes Avista Customers*