**BEFORE THE**

# WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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

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

1. 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:

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| --- | --- |
| Jesse E. Cowell  Davison Van Cleve, P.C.  333 S.W. Taylor, Suite 400  Portland, OR 97204  jec@dvclaw.com  Telephone: (503) 241-7242  Facsimile: (503) 241-8160 | Bradley G. Mullins  333 S.W. Taylor, Suite 400  Portland, OR 97204  brmullins@mwanalytics.com  Telephone: (503) 954-2852 |

1. The administrative rules at issue are WAC § 480-07-340, -355.
2. 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.
3. 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.
4. 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.
5. 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.
6. 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.

*/s/ Jesse E. Cowell*

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Of Attorneys for the Industrial Customers

of Northwest Utilities

# ATTACHMENT A

## MEMBERS OF INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

Air Liquide

Air Products

AkzoNobel

Alcoa

Amcor 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*