

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND	)	DOCKET NO. UE-061411
TRANSPORTATION COMMISSION,	)	
	)	
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:

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 rate increase. 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 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, UE-050482, and UE-060181. 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.

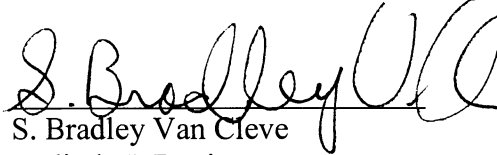
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WHEREFORE, ICNU respectfully petitions the Commission for leave to intervene in this proceeding.

Dated in Portland, Oregon, this 22nd day of September, 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  
SP Newsprint Co.  
Tesoro Refining and Marketing Co.  
Wah Chang  
West Linn Paper Company  
Weyerhaeuser

\* *Denotes Avista Customers*