

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND)	
TRANSPORTATION COMMISSION,)	
)	DOCKET NO. U-121165
Complainant,)	
)	
v.)	PETITION TO INTERVENE OF THE
)	INDUSTRIAL CUSTOMERS OF
PUGET SOUND ENERGY, INC.,)	NORTHWEST UTILITIES
)	
Respondent.)	
_____)	

1 Pursuant to WAC § 480-07-355, the Industrial Customers of Northwest Utilities (“ICNU”) petitions the Washington Utilities and Transportation Commission (“WUTC” or “Commission”) for leave to intervene in the above-captioned proceeding, 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

ICNU will be represented in this proceeding by Davison Van Cleve, P.C. All documents relating to these proceedings should be served on ICNU’s attorneys and consultant at the following addresses:

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2 The administrative rules that this petition puts 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.
Many members of ICNU purchase power or pay conservation tariffs from Puget Sound
Energy (“PSE”), as indicated on Attachment A. ICNU has been a party to many proceedings
before the Commission involving PSE, including PSE’s most recent general rate case (UE-
111048).

4 ICNU’s member companies have a substantial interest in PSE’s request that
the Commission clarify the definition of conservation in the Energy Independence Act
(19.285 RCW). Specifically, PSE would like the Commission to clarify that a utility’s
investments in electric power production equipment are not conservation, as they do not
reduce electric power consumption. The Commission’s ruling could directly affect those of
ICNU’s members who purchase power, transmission and/or distribution services from PSE,
and who participate in PSE’s conservation programs. ICNU requests leave to intervene in
this proceeding to represent its members who are affected by the proposed changes.

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. It is in the public interest to allow ICNU to intervene in this proceeding. ICNU, therefore, requests that the Commission grant its Petition to Intervene and make ICNU a party to this proceeding.

6 ICNU believes its participation in this proceeding will assist the Commission. Furthermore, ICNU's intervention in this proceeding will not unreasonably broaden the issues, burden the record, or delay this proceeding.

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

Dated in Portland, Oregon, this 18th day of July, 2012.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Irion A. Sanger

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

*Air Liquide
*Air Products
*Ampcor Rigid Plastics
Certain Teed Gypsum
*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
Inland Empire Paper Co.
*Intel
International Paper
J.R. Simplot
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
*Tesoro Refining and Marketing Co.
Timber Products, Inc.
Wah Chang
West Linn Paper Company
*Weyerhaeuser

*Members served by Puget Sound Energy