

**BEFORE THE**

**WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND	)	DOCKET NO. UE-111048
TRANSPORTATION COMMISSION,	)	
	)	PETITION TO INTERVENE OF THE
Complainant,	)	INDUSTRIAL CUSTOMERS OF
	)	NORTHWEST UTILITIES
v.	)	
	)	
PUGET SOUND ENERGY, INC.,	)	
	)	
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  
1300 SW 5th Ave, Suite 1750  
Portland, OR 97201

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 consultant 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. Many members of ICNU purchase power and power  
delivery services 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-090704).

4 ICNU’s member companies have a substantial interest in PSE’s proposed  
rate increase. The proposed rate change would substantially and directly affect those of  
ICNU’s members who purchase power, transmission and/or distribution services from  
PSE. ICNU requests leave to intervene in this proceeding to represent its members who  
are affected by the proposed rate increase.

5 ICNU has extensive experiences involving PSE’s rates. 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.

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. ICNU, therefore, requests that the Commission grant its Petition to Intervene and make ICNU a party to this proceeding.

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

Dated in Portland, Oregon, this 14th day of June, 2011.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Melinda J. Davison

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Of Attorneys for Industrial Customers  
of Northwest Utilities

**ATTACHMENT A**  
**MEMBERS OF INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES**

\*Air Liquide  
\*Air Products  
\*Amcor PET Packaging USA, Inc. (CNC Containers Northwest)  
Certain Teed Gypsum & Ceiling Manufacturing, Inc. (BPB)  
\*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  
Hewlett-Packard  
Inland Empire Paper Co.  
\*Intel  
International Paper  
J.R. Simplot  
Kimberly-Clark Corporation  
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  
SP Newsprint  
\*Tesoro Refining and Marketing Co.  
Timber Products, Inc.  
Wah Chang  
West Linn Paper Company  
\*Weyerhaeuser

\*Members served by Puget Sound Energy