

BEFORE THE

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Petition of)
)
PUGET SOUND ENERGY, INC.,) DOCKET NO. UE-082128
)
)
For a Determination of Emissions)
Compliance and Proposed Accounting) PETITION TO INTERVENE OF THE
Treatment For the Mint Farm Energy) INDUSTRIAL CUSTOMERS OF
Center; or, Alternatively For an) NORTHWEST UTILITIES
Accounting Order)

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:

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 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. A list of ICNU members is included as Attachment A.
Many members of ICNU purchase power from Puget Sound Energy (“PSE”), as indicated on
Attachment A.

4 ICNU’s member companies have a substantial interest in the determination of
emissions compliance and proposed accounting treatment for the Mint Farm Energy Center;
or, alternatively for an accounting order. ICNU seeks to intervene in this proceeding to
ensure that the proposed accounting treatment complies with Washington law and will not
harm PSE’s customers. ICNU requests leave to intervene in this docket to represent its
members who may be affected by the outcome of this proceeding.

5 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. ICNU also has extensive experience in proceedings involving PSE. ICNU
has participated in PSE’s general rate cases and power cost only rate proceedings.

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 this 27th day of January, 2009.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Irion A. Sanger

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Of Attorneys for Industrial Customers
of Northwest Utilities

ATTACHMENT A

INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

Air Liquide*
Air Products*
Amcor PET Packaging USA, Inc. (CNC Containers Northwest)*
Certain Teed Gypsum & Ceiling Manufacturing, Inc. (BPB)
Blue Heron Paper Company
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
Grays Harbor Paper, L.P.
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.*
Wah Chang
West Linn Paper Company
Weyerhaeuser*

*Members served by Puget Sound Energy