

BEFORE THE

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Application of)	
)	
PUGET SOUND ENERGY, INC.)	DOCKET NO. UE-131099
)	
For an Order Authorizing the Sale of the)	
Water Rights and Associated Assets of the)	PETITION TO INTERVENE OF THE
Electron Hydroelectric Project in)	INDUSTRIAL CUSTOMERS OF
Accordance with WAC 480-143 and)	NORTHWEST UTILITIES
RCW 80.12)	
)	

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 from Puget Sound Energy (“PSE” or the
“Company”), as indicated on Attachment A. ICNU has been a party to many proceedings
before the Commission involving PSE, including UE-130137, UE-121097, UE-121373 and
UE-120277.

4 Pursuant to their Asset Purchase Agreement executed on May 30, 2013, PSE
and Electron Hydro LLC (“Electron Hydro”) have entered into an agreement whereby PSE
would sell to Electron Hydro certain assets related to PSE’s Electron Hydroelectric Project
(the “Electron Project”). On June 6, 2013, PSE filed an application with the Commission in
which it requested an order authorizing the transfer of these Electron Project assets to
Electron Hydro on or before August 9, 2013. Some of ICNU’s member companies have a
substantial interest in PSE’s request, which if approved could have a direct impact on rates.
ICNU requests leave to intervene in this proceeding to represent its members who would be
affected by the proposed transaction.

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 28th day of June, 2013.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.


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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