BEFORE THE

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,) DOCKET NO. UE-060266)
Complainant,) PETITION TO INTERVENE OF THE) INDUSTRIAL CUSTOMERS OF
V.) NORTHWEST UTILITIES
PUGET SOUND ENERGY, INC.,)))
Respondent.)
•	

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-referenced consolidated Dockets, 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 consultants at the following addresses:

PAGE 1 – PETITION TO INTERVENE OF ICNU

1

DAVISON VAN CLEVE, P.C. 333 S.W. Taylor, Suite 400 Portland, OR 97204 Telephone: (503) 241-7242 S. Bradley Van Cleve Matthew W. Perkins Davison Van Cleve, P.C. 333 S.W. Taylor Suite 400 Portland, OR 97204 Telephone: 503-241-7242 Facsimile: 503-241-8160

mail@dvclaw.com

Donald W. Schoenbeck Regulatory & Cogeneration Services, Inc. 900 Washington Street Suite 780 Vancouver, WA 98660 Telephone: 503-232-6155 Facsimile: 360-737-7628 dws@r-c-s-inc.com Michael P. Gorman Brubaker & Associates 1215 Fern Ridge Pkwy Suite 208 St. Louis, MO 63141 Telephone: (314) 275-7007 Facsimile: (314) 275-7036 mgorman@consultbai.com

The administrative rules that this petition puts at issue are WAC § 480-07-340, -355.

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.

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 distribution services from PSE. ICNU requests leave to intervene in this proceeding to represent its members who are affected by the proposed rate increase.

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.

PAGE 2 – PETITION TO INTERVENE OF ICNU

DAVISON VAN CLEVE, P.C. 333 S.W. Taylor, Suite 400 Portland, OR 97204 Telephone: (503) 241-7242

2

3

5

4

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.

WHEREFORE, ICNU respectfully petitions the Commission for leave to

intervene in this proceeding.

7

Dated in Portland, Oregon, this 13th day of March, 2006.

Respectfully submitted,

DAVISON YAN CLEVE, P.C.

S. Bradley Van Cleve Matthew W. Perkins

333 S.W. Taylor, Suite 400

Portland, Oregon 97204

(503) 241-7242 telephone

(503) 241-8160 facsimile

mail@dvclaw.com

Of Attorneys for Industrial Customers

of Northwest Utilities

PAGE 3 – PETITION TO INTERVENE OF ICNU

DAVISON VAN CLEVE, P.C. 333 S.W. Taylor, Suite 400 Portland, OR 97204 Telephone: (503) 241-7242

ATTACHMENT AINDUSTRIAL 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 Structurals, Inc.

Pioneer Americas LLC

Ponderay Newsprint Co

Shell Oil Products US*

Simpson Paper

Simpson Timber

Solar Grade Silicon LLC

Tesoro Refining and Marketing Co.*

Wah Chang

West Linn Paper Company

Weyerhaeuser*

^{*}Denotes PSE Customers