

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of)	DOCKET UE-170327
)	
Avista Corporation, d/b/a Avista Utilities)	
)	PETITION TO INTERVENE OF
For an Order Authorizing Deferred)	THE INDUSTRIAL CUSTOMERS OF
Accounting Treatment related to the)	NORTHWEST UTILITIES
Company's Investment in Advanced)	
Metering Infrastructure and Approval of)	
Depreciation Rate)	
_____)	

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:

Industrial Customers of Northwest Utilities
818 SW 3rd Avenue #266
Portland, OR 97204

2 ICNU will be represented in this proceeding by Davison Van Cleve, P.C. (“DVC”). All documents relating to this proceeding should be served on ICNU’s attorney and independent consultant at the following addresses:

Jesse E. Cowell	Bradley G. Mullins
Davison Van Cleve, P.C.	333 S.W. Taylor, Suite 400
333 S.W. Taylor, Suite 400	Portland, OR 97204
Portland, OR 97204	brmullins@mwanalytics.com
jec@dvclaw.com	Telephone: (503) 954-2852
Telephone: (503) 241-7242	Consultant for ICNU
Of Attorneys for ICNU	

ICNU does not request paper service, unless required by WUTC rules or law. If permitted by the presiding officer, ICNU also requests that electronic service be provided to the following:

Jesse O. Gorsuch
jog@dvclaw.com
Administrative staff for DVC

Haley M. Thomas
hmt@dvclaw.com
Administrative staff for DVC

3 The administrative rules at issue are WAC § 480-07-340, -355.

4 ICNU is an incorporated, non-profit association of large electric customers in the
Pacific Northwest. A list of ICNU members is included as Attachment A. ICNU represents
some of Avista Corporation’s (“Avista” or the “Company”) largest customers.

5 ICNU’s member companies that take service from Avista have a substantial
interest in the regulatory treatment of Avista’s accounting petition, filed by the Company on May
1, 2017. The potential rate consequences of deferred accounting and adjusted depreciation
sought by the Company would substantially and directly affect those ICNU members who
purchase power from Avista. ICNU requests leave to intervene in this docket to represent and
take positions on behalf of its members who may be affected by Avista’s petition.

6 ICNU has extensive experience in proceedings before the Commission involving
Avista. ICNU participated in the Company’s most recently concluded general rate case, UE-
160228, and many prior Company rate proceedings over the past decades. ICNU is also a party
to the Company’s current general rate case, UE-170485. 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.

7 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. Thus, it is in the public
interest to allow ICNU to intervene in this proceeding.

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

Dated this 1st day of September, 2017.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Jesse E. Cowell

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Of Attorneys for the Industrial Customers
of Northwest Utilities

ATTACHMENT A

MEMBERS OF INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

Airgas USA, LLC
Air Liquide
Air Products
AkzoNobel
Alcoa
Amcors Rigid Plastics
Axiall, Inc.
Boeing
*Boise Cascade, LLC
Columbia Steel
Lamb Weston
*Darigold
Dyno Nobel, Inc.
Emerald Performance Materials, LLC
Evraz, Inc.
Freres Lumber Co.
Georgia-Pacific
Grant PUD Industries
*Inland Empire Paper Co.
Intel Corp
International Paper
*J.R. Simplot
Kapstone Kraft Paper
Legacy Health
Linde, Inc.
Microsoft Corporation
Norpac Foods
North Pacific Paper Co.
Northwest Hardwoods
Packaging Corporation of America
PCC Structurals, Inc.
Ponderay Newsprint
REC Solar Grade Silicon LLC
Schnitzer Steel
Shell Oil Products US
Tesoro Refining and Marketing Co.
Timber Products, Inc.
Wah Chang
WestRock
West Linn Paper Company
Weyerhaeuser

**Denotes Avista Customers*