

BEFORE THE

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND) DOCKET NO. UE-111048
TRANSPORTATION COMMISSION,)
) AMENDED PETITION TO
Complainant,) INTERVENE OF THE INDUSTRIAL
) CUSTOMERS OF NORTHWEST
v.) UTILITIES
)
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 7th day of July, 2011.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Jesse E. Cowell

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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 Structural, 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