

BEFORE THE

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND)	
TRANSPORTATION COMMISSION,)	
)	DOCKET NO. UE-070725
Complainant,)	
)	
v.)	PETITION TO INTERVENE OF THE
)	INDUSTRIAL CUSTOMERS OF
PUGET SOUND ENERGY, INC.,)	NORTHWEST UTILITIES
)	
Respondent.)	
)	

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 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”), as indicated on
Attachment A. ICNU has been a party to many proceedings before the Commission
involving PSE, including PSE’s pending general rate case (UE-090704).

4 ICNU’s member companies have a substantial interest in PSE’s proposed
accounting treatment and disposition of net proceeds requested in PSE's Amended Petition in
this docket, dated October 7, 2009, with respect to the sale of Renewable Energy Credits and
Carbon Financial Instruments. The revenue allocation proposed in the Amended Petition
would substantially and directly affect the roles of those ICNU 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 accounting
treatment and disposition of net proceeds.

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

PAGE 2 – PETITION TO INTERVENE OF ICNU

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 22nd day of October, 2009.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ S. Bradley Van Cleve

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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