

**BEFORE THE**

**WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND	)	
TRANSPORTATION COMMISSION,	)	
	)	DOCKET NO. UE-090704/UG-090705
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:

S. Bradley Van Cleve  
Irion Sanger  
Davison Van Cleve, P.C.  
333 S.W. Taylor, Suite 400  
Portland, OR 97204  
Telephone: 503-241-7242  
Facsimile: 503-241-8160  
bvc@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

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 most recent general rate case (UE-072300).

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                   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

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 26th day of May, 2009.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ S. Bradley Van Cleve

S. Bradley Van Cleve

Irion Sanger

Davison Van Cleve, P.C.

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

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