

BEFORE THE

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Joint Application of) DOCKET NO. UE-051090
)
MIDAMERICAN ENERGY) PETITION TO INTERVENE OF THE
HOLDINGS COMPANY AND) INDUSTRIAL CUSTOMERS OF
PACIFICORP, d/b/a PACIFIC) NORTHWEST UTILITIES
POWER & LIGHT COMPANY)
)
For an Order Authorizing Proposed)
Transaction.)
_____)

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:

Ken Canon
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 also be served on ICNU’s attorneys at the following address:

Melinda J. Davison
Matthew W. Perkins
Davison Van Cleve, P.C.
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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. A list of ICNU members is included as
Attachment A. Many members of ICNU purchase power from PacifiCorp, as indicated
on Attachment A, and represent some of PacifiCorp's largest customers.

4 ICNU's member companies have a substantial interest the Application
filed by MidAmerican Energy Holdings Company and PacifiCorp. ICNU seeks to
intervene in this proceeding to ensure that the proposed acquisition complies with
Washington law and will not harm PacifiCorp's Washington customers. ICNU requests
leave to intervene in this Docket to represent its members who are affected by the
proposed transaction.

5 ICNU has extensive experience in proceedings involving PacifiCorp.
ICNU participated in the proceeding regarding ScottishPower's acquisition of PacifiCorp
in Docket No. UE-981627 as well as PacifiCorp's last three Washington general rate
cases. 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.

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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.

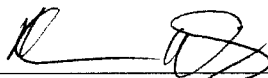
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WHEREFORE, ICNU respectfully petitions the Commission for leave to intervene in this proceeding.

Dated in Portland, Oregon, this 20th day of July, 2005.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.



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ATTACHMENT A
INDUSTRIAL 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 Structural, Inc.
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 PacifiCorp Customers in Washington*