

**BEFORE THE**  
**WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND	)	
TRANSPORTATION COMMISSION,	)	
	)	DOCKET NO. UE-100177
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 most recent general rate case (UE-072300) and current rate  
case (UE-090704).

4                   ICNU’s member companies have a substantial interest in PSE’s proposed  
conservation potential and biennial conservation target report. The proposed report could  
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 report.

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.

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 29th day of March, 2010.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Irion A. Sanger

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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.
- Certain Teed Gypsum & Ceiling Manufacturing (BPB)
- Blue Heron Paper Company
- \*Boeing
- Boise Paper
- Boise Cascade LLC
- ConAgra Foods
- D.R. Johnson Lumber Co.
- Dyno Nobel, Inc.
- Eka Chemicals, Inc.
- Emerald Kalama Chemical, LLC
- Equa-Chlor, LLC
- 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.
- REC Solar Grade Silicon LLC
- SP Newsprint
- \*Shell Oil Products US
- Simpson Paper & Timber
- \*Tesoro Refining and Marketing Co.
- Wah Chang
- West Linn Paper Company
- Weyerhaeuser

\*Members served by Puget Sound Energy