**BEFORE THE**

# WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

|  |  |  |
| --- | --- | --- |
| WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,  Complainant,  v.  PACIFIC POWER & LIGHT COMPANY,  Respondent. | )  )  )  )  )  )  )  )  )  )  ) | DOCKET NO. UE-144160  PETITION TO INTERVENE OF BOISE  WHITE PAPER, L.L.C. |

1. Pursuant to WAC § 480-07-355, Boise White Paper, L.L.C. (“Boise”) 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 Boise is:

Boise White Paper, L.L.C.  
1111 W. Jefferson Street

PO Box 50

Boise, ID 83728

1. Boise will be represented in this proceeding by Davison Van Cleve, P.C. All documents relating to this proceeding should also be served on Boise’s attorneys at the following address:

Melinda J. Davison

Tyler C. Pepple

Davison Van Cleve, P.C.

333 S.W. Taylor, Suite 400

Portland, OR 97204

mjd@dvclaw.com

tcp@dvclaw.com

Telephone: (503) 241-7242

Facsimile: (503) 241-8160

1. The administrative rules at issue are WAC § 480-07-340, -355.
2. Boise is Pacific Power & Light’s (“PacifiCorp” or the “Company”) largest customer in Washington, purchasing both power and power delivery services at its mill in Wallula, Washington. Boise was a party to PacifiCorp’s most recent completed general rate case (UE-140762).
3. Boise has a substantial interest in PacifiCorp’s proposed changes to its Schedule 37 reflecting new avoided cost rates for qualifying facilities. Changes to the rates the Company pays its QFs in Washington may also impact the rates Boise pays to PacifiCorp. Boise requests leave to intervene in this Docket to represent its interests which are directly affected by PacifiCorp’s proposed Schedule 37 changes.
4. Boise’s legal counsel has extensive experience in proceedings before the Commission involving PacifiCorp’s rates. Boise directly participated in PacifiCorp’s most recent general rate case and has participated, as a member of the Industrial Customers of Northwest Utilities, in other PacifiCorp rate proceedings, including UE-032065, UE-050684, UE-060669, UE-061546, UE-080220, UE-090205, UE-100749, UE 111190, UE-130043, and UE-140762. Boise’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.
5. As described above, Boise 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 Boise to intervene in this proceeding.
6. WHEREFORE, Boise respectfully petitions the Commission for leave to intervene in this proceeding.

Dated this 14th day of April, 2015.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

*/s/ Tyler C. Pepple*

Melinda J. Davison

Tyler C. Pepple

333 S.W. Taylor, Suite 400

Portland, Oregon 97204

(503) 241-7242 telephone

(503) 241-8160 facsimile

mjd@dvclaw.com

tcp@dvclaw.com

Of Attorneys for Boise White Paper, L.L.C.