BEFORE THE

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND) DOCKET NO. UE-050482
TRANSPORTATION COMMISSION,)
) DOCKET NO. UG-050483
Complainant,) (consolidated)
)
V.) PETITION TO INTERVENE OF THE
) INDUSTRIAL CUSTOMERS OF
AVISTA CORPORATION d/b/a AVISTA) NORTHWEST UTILITIES
UTILITIES,)
)
Respondent.)

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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 and consultants

at the following addresses:

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DAVISON VAN CLEVE, P.C. 333 S.W. Taylor, Suite 400 Portland, OR 97204 Telephone: (503) 241-7242

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The administrative rules at issue are WAC §§ 480-07-340, -355.

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. ICNU represents some of Avista's largest customers.

ICNU's member companies have a substantial interest in Avista's proposed rate increase. The proposed rate change would substantially and directly affect those ICNU members who purchase power from Avista. ICNU requests leave to intervene in this Docket to represent its members who are affected by the proposed rate increase.

ICNU has extensive experiences involving Avista's rates. ICNU participated in Avista's most recent rate cases, including UE-991606, UE-011029 and UE-011595. 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.

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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DAVISON VAN CLEVE, P.C. 333 S.W. Taylor, Suite 400 Portland, OR 97204 Telephone: (503) 241-7242 intervene in this proceeding.

Dated in Portland, Oregon, this 17th day of May, 2005.

Respectfully submitted,

DAVISON VAN CLEYE, P.C. £ Ned

S. Bradley Van Cleve Matthew W. Perkins 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

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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 Structurals, 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 Avista Customers