

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of)	
)	
)	
Revisions to Puget Sound Energy Inc.'s)	Docket No. UE-120277
Electric Schedule 95A – Federal)	
Incentive Tracker)	
)	
)	
)	

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:

Industrial Customers of Northwest Utilities
818 SW 3rd Avenue, #266
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 consultant at the following addresses:

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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. Many members of ICNU purchase power and power
delivery services 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-111048/UG-111049).

4 ICNU’s member companies have a substantial interest in PSE’s revisions
to its Electric Schedule 95A. The Commission’s decision whether or not to pass through
to customers interest credit on the unamortized balance of U.S. Treasury Department
grants required by the amended Section 1603 of the 2009 American Recovery and
Reinvestment Tax Act would substantially and directly affect those of ICNU’s members
who purchase power services from PSE. ICNU requests leave to intervene in this
proceeding to represent its members who are affected by the outcome.

5 ICNU has extensive experience in proceedings involving PSE. ICNU has
already filed a response brief in this proceeding and believes that its continued
participation will assist the Commission. Furthermore, ICNU’s intervention in this
proceeding will not unreasonably broaden the issues, burden the record, or delay this
proceeding.

6 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.

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

Dated in Portland, Oregon, this 25th day of May, 2012.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Irion A. Sanger

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Of Attorneys for Industrial Customers
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ATTACHMENT A

MEMBERS OF INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

*Air Liquide
*Air Products
*Ampcor Rigid Plastics
Certain Teed Gypsum
*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
Inland Empire Paper Co.
*Intel
International Paper
J.R. Simplot
Linde, Inc.
Longview Fibre
*Microsoft Corporation
Norpac Foods
PCC Structural, Inc.
Ponderay Newsprint
REC Solar Grade Silicon LLC
*Shell Oil Products US
Simpson Paper & Timber
*Tesoro Refining and Marketing Co.
Timber Products, Inc.
Wah Chang
West Linn Paper Company
*Weyerhaeuser

*Members served by Puget Sound Energy