

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND)	DOCKET UE-161204
TRANSPORTATION COMMISSION,)	
)	
Complainant,)	
)	
v.)	PETITION TO INTERVENE OF BOISE
)	WHITE PAPER, L.L.C.
PACIFIC POWER & LIGHT COMPANY,)	
)	
Respondent.)	
_____)	

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:

Patrick Loupin
Corporate Purchasing Manager – Energy
Boise White Paper, L.L.C.
P.O. Box 990050
Boise, ID 83799-0050
PatrickLoupin@packagingcorp.com

Boise will be represented in this proceeding by Davison Van Cleve, P.C. All documents relating to this proceeding should be served on Boise through its designated representative above, as well as on Boise’s attorney and independent consultant, at the following addresses:

Jesse E. Cowell
Davison Van Cleve, P.C.
333 S.W. Taylor, Suite 400
Portland, OR 97204
jec@dvclaw.com
Telephone: (503) 241-7242
Facsimile: (503) 241-8160

Bradley G. Mullins
333 S.W. Taylor, Ste. 400
Portland, OR 97204
E-Mail: brmullins@mwanalytics.com
Telephone: (503) 954-2852
Facsimile: (503) 241-8160^{1/}

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

3 Boise manufactures and distributes paper products in the United States, including
sheet papers, containerboard and corrugated containers, and market pulp. Boise is Pacific Power
& Light Company's ("Pacific Power" or the "Company") largest customer in Washington,
purchasing both power and power delivery services at its mill in Wallula, Washington. Boise is
a member of the Industrial Customers of Northwest Utilities ("ICNU"),^{2/} which has been a party
to many proceedings before the Commission involving Pacific Power and other Washington
utilities. Boise was a party to Pacific Power's most recent rate case, Docket UE-152253.

4 Boise has a substantial interest in Pacific Power's proposed revisions to currently
effective Tariff WN U-75, including portions of Rules 1, 4, and 6, as well as Schedule 300.
More specifically, the Company has proposed significant modifications to procedures and fees
associated with permanent customer disconnection and facility removal. As Pacific Power's
largest Washington customer, Boise could be substantially and directly affected by these
proposed modifications, including the assessment of new stranded cost recovery fees. Thus,
Boise requests leave to intervene in this Docket to represent its interests which are directly
affected by Pacific Power's proposed tariff revisions.

^{1/} To the extent that the official service list is limited to two Boise representatives, Boise requests that independent consultant Bradley Mullins be added to a courtesy e-mail service list.

^{2/} ICNU is an incorporated, non-profit association of large industrial electric customers in the Northwest.

5 Boise's legal counsel and expert have extensive experience in proceedings before
6 the Commission involving Pacific Power tariffs, rules, and rate schedules. Boise, both itself and
7 as a member of ICNU, has participated in several Company rate cases, including Dockets
8 UE-991832, UE-032065, UE-050684, UE-060669, UE-061546, UE-080220, UE-090205,
9 UE-100749, UE-111190, UE-130043, UE-140762, and UE-152253. Boise's intervention in this
10 proceeding will assist the Commission in resolving the issues and will not unreasonably broaden
11 the issues, burden the record, or delay this proceeding. Boise will take the position of supporting
12 relevant tariff provisions that will be shown to be fair, just, and reasonable.

6 As described above, Boise has a direct and substantial interest in this proceeding
7 that will not be adequately represented by any other party, and may be affected by any
8 Commission determination connected with this proceeding. It is in the public interest to allow
9 Boise to intervene in this proceeding.

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

Dated this 12th day of December, 2016.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.



Jesse E. Cowell
333 S.W. Taylor, Suite 400
Portland, Oregon 97204
(503) 241-7242 (telephone)
(503) 241-8160 (facsimile)
jec@dvclaw.com
Of Attorneys for Boise White Paper, L.L.C.