

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

WASHINGTON UTILITIES AND	)	DOCKET UE-170484
TRANSPORTATION COMMISSION	)	
	)	
Complainant,	)	PETITION TO INTERVENE OF
	)	THE INDUSTRIAL CUSTOMERS OF
v.	)	NORTHWEST UTILITIES
	)	
AVISTA CORPORATION d/b/a	)	
AVISTA UTILITIES	)	
	)	
Respondent.	)	

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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 3<sup>rd</sup> Avenue #266  
Portland, OR 97204

2 ICNU will be represented in this proceeding by Davison Van Cleve, P.C. (“DVC”). All documents relating to this proceeding should be served on ICNU’s attorney and independent consultant at the following addresses:

Jesse E. Cowell	Bradley G. Mullins
Davison Van Cleve, P.C.	333 S.W. Taylor, Suite 400
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Telephone: (503) 241-7242	Consultant for ICNU
Of Attorneys for ICNU	

ICNU does not request paper service, unless required by WUTC rules or law. If permitted by the presiding officer, ICNU also requests that electronic service be provided to the following:

Patrick J. Oshie  
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3           The administrative rules at issue are WAC § 480-07-340, -355.

4           ICNU is an incorporated, non-profit association of large electric customers in the  
Pacific Northwest. A list of ICNU members is included as Attachment A. ICNU represents  
some of Avista Corporation’s (“Avista” or the “Company”) largest customers.

5           ICNU’s member companies that take service from Avista have a substantial  
interest in Avista’s proposed Power Cost Rate Adjustment (“PCRA”) request, filed by the  
Company on May 26, 2017. The PCRA would substantially and directly affect those ICNU  
members who purchase power from Avista—including rate increases that could exceed the  
proposed 2.92% average, based on variable energy block usage. ICNU requests leave to  
intervene in this docket to represent and take positions on behalf of its members who are affected  
by Avista’s proposed PCRA.

6           ICNU has extensive experience in proceedings before the Commission involving  
Avista. ICNU participated in the Company’s most recent general rate case, UE-160228, and  
many prior Company rate proceedings over the past decades. ICNU’s intervention in this  
proceeding will assist the Commission in resolving PCRA issues and will not unreasonably  
broaden the issues, burden the record, or delay this proceeding. ICNU is presently considering,  
however, whether broadening the PCRA proceeding or consolidating the PCRA request into the  
concurrent general rate case would be reasonable and in the best interests of ratepayers.

7                   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. Thus, it is in the public interest to allow ICNU to intervene in this proceeding.

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

Dated this 1st day of June, 2017.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

*/s/ Jesse E. Cowell*

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Of Attorneys for the Industrial Customers  
of Northwest Utilities

## ATTACHMENT A

### MEMBERS OF INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

Airgas USA, LLC  
Air Liquide  
Air Products  
AkzoNobel  
Alcoa  
Amcor Rigid Plastics  
Axiall, Inc.  
Boeing  
\*Boise Cascade, LLC  
Columbia Steel  
ConAgra Foods  
\*Darigold  
Dyno Nobel, Inc.  
Emerald Performance Materials, LLC  
Evraz, Inc.  
Freres Lumber Co.  
Georgia-Pacific  
Grant PUD Industries  
\*Inland Empire Paper Co.  
Intel Corp  
International Paper  
\*J.R. Simplot  
Kapstone Kraft Paper  
Legacy Health  
Linde, Inc.  
Microsoft Corporation  
Norpac Foods  
North Pacific Paper Co.  
Northwest Hardwoods  
Packaging Corporation of America  
PCC Structurals, Inc.  
Ponderay Newsprint  
REC Solar Grade Silicon LLC  
Schnitzer Steel  
Shell Oil Products US  
Tesoro Refining and Marketing Co.  
Timber Products, Inc.  
Wah Chang  
WestRock  
West Linn Paper Company  
Weyerhaeuser

*\*Denotes Avista Customers*