

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND)	DOCKET NO. UE-111190
TRANSPORTATION COMMISSION,)	
)	
Complainant,)	
)	PETITION TO INTERVENE OF THE
v.)	INDUSTRIAL CUSTOMERS OF
)	NORTHWEST UTILITIES
PACIFICORP D/B/A PACIFIC POWER &)	
LIGHT COMPANY,)	
)	
Respondent.)	

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:

Michael Early
Executive Director
Industrial Customers of Northwest Utilities
1300 SW 5th Ave, Suite 1750
Portland, OR 97201

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. Several members of ICNU purchase power and
power delivery services from Pacific Power & Light (“PacifiCorp” or the “Company”),
as indicated on Attachment A. ICNU has been a party to many proceedings before the
Commission involving PacifiCorp, including PacifiCorp’s most recent general rate case
(UE-100749).

4 ICNU’s member companies have a substantial interest in PacifiCorp’s
proposed rate increase, which comes only three months after the final order in the
Company’s 2010 general rate case, in which the Commission allowed PacifiCorp to
increase its base rates by approximately \$33 million or 10.5% for all customers.
PacifiCorp is now proposing an additional \$12.9 million rate increase, which is an
average increase of 4.3%. The proposed rate change would substantially and directly
affect those ICNU members who purchase power from PacifiCorp. ICNU requests leave
to intervene in this Docket to represent its members who are affected by PacifiCorp’s
proposals.

5

ICNU has extensive experience in proceedings before the Commission involving PacifiCorp's rates. ICNU participated in PacifiCorp's most recent general rate cases, including UE-991832, UE-032065, UE-050684, UE-060669, UE-061546, UE-080220, UE-090205, and UE-100749. 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.

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.

7

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

Dated in Portland, Oregon, this 8th day of July, 2011.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Irion A. Sanger

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ATTACHMENT A
INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

Air Liquide
Air Products
Amcor PET Packaging USA, Inc. (CNC Containers Northwest)
Certain Teed Gypsum & Ceiling Manufacturing, Inc. (BPB)
Blue Heron Paper Company
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
Grays Harbor Paper, L.P.
Hewlett-Packard
Inland Empire Paper Co.
Intel
International Paper
*J.R. Simplot
Kimberly-Clark Corporation
Linde, Inc.
*Longview Fibre
Microsoft Corporation
Norpac Foods
PCC Structurals, Inc.
Ponderay Newsprint
REC Solar Grade Silicon LLC
Shell Oil Products US
Simpson Paper & Timber
SP Newsprint
Tesoro Refining and Marketing Co.
Wah Chang
West Linn Paper Company
Weyerhaeuser

**Denotes ICNU Members served by PacifiCorp in Washington*