BEFORE THE

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of) DOCKET UE-181042
PACIFICORP, dba PACIFIC POWER & LIGHT COMPANY,))) PETITION TO INTERVENE OF BOISE) WHITE PAPER, L.L.C.
Petition for an Order Approving Deferred)
Accounting and Accounting Order Related)
to Non-Contributory Defined Benefit)
Pension Plans.	
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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 for 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

("DVC"). 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,

respectively, at the following addresses:

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DAVISON VAN CLEVE, P.C. 1750 SW Harbor Way, Suite 450 Portland, OR 97201 Telephone: (503) 241-7242

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Tyler C. Pepple Davison Van Cleve, P.C. 1750 SW Harbor Way, Suite 450 Portland, OR 97201 tcp@dvclaw.com Telephone: (503) 241-7242 Attorney for Boise Bradley G. Mullins 1750 SW Harbor Way, Suite 450 Portland, OR 97201 brmullins@mwanalytics.com Telephone: (503) 954-2852 Consultant for Boise

Boise does not request paper service, unless required by WUTC rules or law. If permitted by the

presiding officer, Boise also requests that electronic service be provided to the following:

Jesse O. Gorsuch jog@dvclaw.com Paralegal for DVC

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

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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 party to the Company's ongoing depreciation rate proceeding, Docket UE-180778, and was a party to Pacific Power's most recent power cost adjustment proceeding, Docket UE-170717, as well as the Company's last general rate case, Docket UE-152253.

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On December 24, 2018, Pacific Power filed its request for a Commission order to defer the impact of non-contributory defined benefit pension plans and to amortize these expenses over the same period used to amortize the Company's underlying regulatory assets or liabilities. The Company currently estimates that deferred expenses will be approximately \$21 million. If approved by the Commission, Pacific Power's proposal would substantially and

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DAVISON VAN CLEVE, P.C. 1750 SW Harbor Way, Suite 450 Portland, OR 97201 Telephone: (503) 241-7242 directly affect Boise. Accordingly, Boise requests leave to intervene in this proceeding to represent its interests which are directly affected by Pacific Power's request.

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Boise's legal counsel and expert have extensive experience in proceedings before the Commission involving Pacific Power tariffs, rules, and rate schedules. Boise has participated in numerous Company proceedings, and most recently in UE-140762, U-151958, UE-152253, UE-161204, UE-170717, and UE-180778. Boise'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, Boise 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 Boise to intervene in this proceeding.

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

Dated this 4th day of January, 2019.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

<u>/s/ Tyler C. Pepple</u> Tyler C. Pepple, WSBA #50475 1750 SW Harbor Way, Suite 450 Portland, OR 97201 Telephone: (503) 241-7242 E-Mail: tcp@dvclaw.com Of Attorneys for Boise White Paper, L.L.C.

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