## **BEFORE THE**

## WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Petition of )	
PUGET SOUND ENERGY, INC., and NW ENERGY COALITION )	DOCKET NO. UE 121697
For an Order Authorizing PSE to Implement ) Electric and Natural Gas Decoupling ) Mechanisms and to Record Accounting )	PETITION TO INTERVENE OF THE INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES
Entries Associated with the Mechanisms )	NORTHWEST UTILITIES

Pursuant to WAC § 480-07-355, the Industrial Customers of Northwest

Utilities ("ICNU") petitions the Washington Utilities and Transportation Commission ("WUTC" or "Commission") for leave to intervene in the above-captioned proceeding, 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 be served on ICNU's attorneys and consultant at the following addresses:

Melinda J. Davison Joshua D. Weber Davison Van Cleve, P.C. 333 S.W. Taylor, Suite 400 Portland, OR 97204 Telephone: 503-241-7242

Facsimile: 503-241-8160

mid@dvclaw.com jdw@dvclaw.com

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Michael Deen

Regulatory & Cogeneration Services, Inc.

900 Washington Street, Suite 780

Vancouver, WA 98660 Telephone: 503-232-6155 Facsimile: 360-737-7628 mdeen@r-c-s-inc.com

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DAVISON VAN CLEVE, P.C. 333 S.W. Taylor, Suite 400 Portland, OR 97204

Telephone: (503) 241-7242

The administrative rules that this petition puts at issue are WAC §480-07-340,

-355.

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ICNU is an incorporated, non-profit association of large industrial electric

customers in the Pacific Northwest. A list of ICNU members is included as Attachment A.

Many members of ICNU purchase power from Puget Sound Energy ("PSE" or the

"Company"), 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) and its petition for the approval of a power purchase agreement for the acquisition

of coal transition power (UE-121373).

On October 25, 2012, PSE filed a petition requesting that the Commission

issue an order authorizing PSE to implement an electric and natural gas decoupling

mechanism and to begin recording accounting entries associated with the mechanism,

effective November 1, 2012. ICNU's member companies have a substantial interest in PSE's

request because a PSE decoupling mechanism would affect the cost of taking electric service

from PSE. ICNU requests leave to intervene in this proceeding to represent its members who

are affected by the proposed decoupling mechanism.

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.

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DAVISON VAN CLEVE, P.C. 333 S.W. Taylor, Suite 400 Portland, OR 97204

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ICNU believes its participation in this proceeding will assist the Commission.

Furthermore, ICNU's intervention in this proceeding will not unreasonably broaden the

issues, burden the record, or delay this proceeding.

WHEREFORE, ICNU respectfully petitions the Commission for leave to

intervene in this proceeding.

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Dated in Portland, Oregon, this 8th day of January, 2013.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Joshua D. Weber

Melinda J. Davison

Joshua D. Weber

Davison Van Cleve, P.C.

333 S.W. Taylor, Suite 400

Portland, Oregon 97204

(503) 241-7242 telephone

(503) 241-8160 facsimile

mjd@dvclaw.com

jdw@dvclaw.com

Of Attorneys for Industrial Customers

of Northwest Utilities

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DAVISON VAN CLEVE, P.C. 333 S.W. Taylor, Suite 400 Portland, OR 97204 Telephone: (503) 241-7242

## ATTACHMENT A

## MEMBERS OF INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

- \*Air Liquide
- \*Air Products
- \*Amcor 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 Structurals, 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

<sup>\*</sup>Members served by Puget Sound Energy