

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Joint Application of	)	DOCKET UE-170970
	)	
HYDRO ONE LIMITED and	)	
AVISTA CORPORATION	)	PETITION TO INTERVENE OF
	)	THE INDUSTRIAL CUSTOMERS OF
For an Order Authorizing Proposed	)	NORTHWEST UTILITIES
Transaction.	)	

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 attorneys 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  
Of Attorneys for ICNU

Patrick J. Oshie  
Davison Van Cleve, P.C.  
507 Ballard Rd.  
Zillah, WA 98953  
Telephone: (360) 870-2218  
Facsimile: (503) 241-8160  
E-Mail: pjo@dvclaw.com  
Of Counsel 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:

Jesse O. Gorsuch  
jog@dvclaw.com  
Administrative staff for DVC

Haley M. Thomas  
hmt@dvclaw.com  
Administrative staff for DVC

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 merger agreement (or “Joint Application”) with Hydro One  
Limited, acting through its indirect subsidiary, Olympus Equity LLC. The Joint Application, if  
approved, could substantially and directly affect those ICNU members who purchase power from  
Avista. ICNU requests leave to intervene in this docket to represent and take positions on behalf  
of its members who are affected by Avista’s and Hydro One’s Joint Application.

6           ICNU has extensive experience in proceedings before the Commission involving  
Avista. ICNU is participating in the Company’s current general rate case, UE-170485, and has  
been a party in many prior Company rate proceedings over the past decades. ICNU’s  
intervention in this proceeding will assist the Commission in resolving issues and will not  
unreasonably broaden the issues, burden the record, or delay this proceeding. ICNU will take the  
position of supporting results deemed fair, just, and reasonable.

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

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

Dated this 21st day of September, 2017.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

*/s/ Jesse E. Cowell*

Jesse E. Cowell, WSBA # 50725

333 S.W. Taylor, Suite 400

Portland, Oregon 97204

Telephone: (503) 241-7242

Facsimile: (503) 241-8160

E-Mail: jec@dvclaw.com

Of Attorneys for the Industrial Customers  
of Northwest Utilities

Patrick J. Oshie, WSB # 17796

507 Ballard Rd.

Zillah, WA 98953

Telephone: (360) 870-2218

E-Mail: pjo@dvclaw.com

Of Counsel 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  
Lamb Weston  
\*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*