

# Sporme Neighborhood Action Programs Housing Improvements Division

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December 8, 1999

Washington Utilities and Transportation Commission 1300 S. Evergreen Park Drive S. W. P.O. Box 47250 Olympia, Washington 98504-7250

Attention: Ms. Carole Washburn, Executive Secretary

DOCKET NO. UE-991606 DOCKET NO. UG-991607

Enclosed for submission to the Commission is a Petition to Intervene in the Avista Electric and Natural Gas Rate Filings, Docket's UE-991606 and UG-991607, completed pursuant to WAC 480-09-430.

Spokane Neighborhood Programs will join the Pre-Hearing Conference via telephone over the conference bridge.

Questions regarding this submission should be directed to Don André at 509-744-3370 ext. 208.

Sincerely,

Don André

Assistant Director, Housing Improvements

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# Before the Washington Utilities and Transportation Commission

In the Matter of the Avista Corporation Electric and Natural Gas Rate Filings	)	UE-991606
	)	UG-991607

# **Petition for Intervention**

Spokane Neighborhood Action Programs (SNAP) hereby requests permission to intervene in the above referenced proceeding concerning the Avista rate filings.

# The Petitioner

SNAP is a 501(c)(3) nonprofit corporation. SNAP's mission is to provide opportunities, resources, and services to low-income and highly vulnerable persons in a manner which enhances dignity and encourages self-sufficiency. Throughout Spokane County, SNAP services improve the lives of families living in poverty, low-income elderly persons, and the homeless. For the past thirty years, SNAP has served as a resource and advocate for these groups. During 1999, SNAP served 8,921 households in Spokane County. SNAP has 96 employees and uses the talents and services of over 400 volunteers each year. As a community action agency, SNAP's board consists of one third elected officials, one third low-income representatives, and one third represent the community at large.

Previously, SNAP intervened in the proceeding following Washington Water Power's declaration of intent to merge with Sierra Pacific Resources. Since 1986, SNAP has played an integral role in the design and implementation of Avista's demand side management and affordability programs. SNAP's primary business address is 2116 East First, Spokane, WA 99202.

#### **Our Interests**

SNAP represents the interests of low-income people in Spokane County. Poverty rates for Spokane County exceed state, regional and national levels. The third legislative district, which includes downtown Spokane, has the lowest per capita income of any district in the state. According to OFM estimates approximately 54,000 County residents were living below the poverty line in 1997. The interests of this large population within Avista's service territory are unique and substantial; they warrant special representation. As a long-term provider of a wide range of services to low-income households, SNAP possesses exceptional knowledge of the daily challenges our clients face. SNAP has a history of advocating for low-income interests as energy policy alternatives and strategies are assessed.

The large rate and service charge increases sought by Avista will profoundly affect low-income people. This increased energy burden may result in a decline in health and safety, as well as force increased trade offs between heat, food, medicine and other basic needs. Finally, Avista may see increased costs through more shut offs and the resulting termination and reconnection costs. Larger arrearages, uncollectables, and increased collection costs may also result from the proposed rate increases.

### Intervention

SNAP does not seek to delay this proceeding or to prejudice any party through its intervention. Nor do we seek to broaden unduly the issues being considered in this docket. SNAP will represent itself in this proceeding and may conduct discovery of Avista. SNAP, in collaboration with the other parties to the case, will investigate strategies to reduce the impact of rate changes on low-income persons and families. SNAP submits that our intervention will assist the Commission and other parties in deliberations concerning Avista's rate filing.

# Service of Documents

SNAP requests that all documents in this proceeding be served on:

Don André Assistant Director, Housing Improvements Spokane Neighborhood Action Programs 212 West Second Avenue, Suite 100 Spokane, WA 99201-3501

# Conclusion

For the foregoing reasons, SNAP requests the Commission to grant this petition for intervention.

DATED this Ith day of December, 1999.

Respectfully submitted, Spokane Neighborhood Action Programs

Don André

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