BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

DOCKETS UE-220066 and UG-220067 (Consolidated)

Complainant,

v.

PUGET SOUND ENERGY,

NW ENERGY COALITION PETITION TO INTERVENE

Respondent.

- 1. Pursuant to Washington Administrative Code ("WAC") § 480-07-355, the NW Energy Coalition ("NWEC") petitions the Washington Utilities and Transportation Commission (the "Commission") to intervene in the above-captioned proceeding with full party status as described in WAC § 480-07-340. The administrative rules at issue are WAC §§ 480-07-340 and 480-07-355. As required in WAC § 480-07-355, NWEC states as follows:
 - 2. The name and address of NWEC is:

Lauren McCloy NW Energy Coalition 811 First Avenue, Suite 305 Seattle, WA 98104 lauren@nwenergy.org Amy Wheeless NW Energy Coalition 811 First Avenue, Suite 305 Seattle, WA 98104 amy@nwenergy.org

3. NWEC will be represented in this proceeding by Earthjustice. All documents relating to these proceedings should be served on the following persons at the addresses listed below:

Lauren McCloy NW Energy Coalition 811 First Avenue, Suite 305 Seattle, WA 98104 lauren@nwenergy.org

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- 4. NWEC is a non-profit organization under section 501(c)(3) of the Internal Revenue Code. NWEC's primary purpose is to promote an energy future that is clean, reliable, affordable, and equitable. NWEC provides technical and policy leadership on energy issues in this region, and seeks to promote the development of renewable energy, energy conservation, and affordable energy services. Due to its historic and ongoing work with utility companies and others to achieve these goals, NWEC possesses a substantial interest in the outcome of this proceeding.
- 5. NWEC has a special interest in this proceeding for the following reasons, including but not limited to: 1) members of NWEC have a direct and substantial interest in Puget Sound Energy's ("PSE") request for a rate change; 2) the proposed rate change and plan could impact PSE's performance and associated customer risks related to its infrastructure investments; 3) PSE's rate change should comply with Washington's climate and clean energy policies; 4) the proposed rate change and plan could impact issues related to PSE's interest in the Colstrip coal-fired power plant in Montana; 5) the proposal could impact PSE's performance metrics and other Senate Bill 5295 implementation issues; and 6) the proposed rate change and plan could impact issues related to customer-side resources, distribution system investment, energy efficiency assistance and other affordability issues for low and moderate income customers.
- 6. In each of these areas NWEC intends to focus its participation on examining whether PSE's filing is fair, just, reasonable and sufficient, and has not yet taken positions with respect to the matters in controversy. NWEC intends to examine these and other issues in this proceeding.

- 7. NWEC offers this process considerable expertise in the areas of resource planning, industry structure, and economic and policy analysis. NWEC has participated in numerous rate cases, mergers, resource planning, and other similar proceedings in Washington, Oregon, Idaho, and Montana.
- 8. NWEC has no intention of unreasonably broadening the issues, burdening the record, or delaying the proceeding through their intervention.
 - 9. It is in the public interest to allow NWEC to intervene in this proceeding.
- 10. For the foregoing reasons, NWEC respectfully petitions the Commission for leave to intervene in this proceeding.

Dated this 22nd day of February, 2022.

Respectfully submitted,

/s/ Jaimini Parekh

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