

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of) DOCKET UE-240194
)
PUGET SOUND ENERGY,)
)
Advice No. 2024-10, Puget Sound Energy’s) PETITION TO INTERVENE OF
Electric Tariff Revision.) THE ALLIANCE OF WESTERN
) ENERGY CONSUMERS
)
)
_____)

1 Pursuant to WAC § 480-07-355, the Alliance of Western Energy Consumers (“AWEC”) 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 AWEC is:

Alliance of Western Energy Consumers
818 SW 3rd Avenue, #266
Portland, OR 97204

2 AWEC will be represented in this proceeding by Davison Van Cleve, P.C (“DVC”). All documents relating to this proceeding should be served on AWEC’s attorneys at the following addresses:

Tyler C. Pepple
Davison Van Cleve, P.C.
107 SE Washington St., Suite 430
Portland, OR 97214
tcp@dvclaw.com
Telephone: (503) 241-7242
Attorney for AWEC

Sommer J. Moser
Davison Van Cleve, P.C.
107 SE Washington St., Suite 430
Portland, OR 97214
sjm@dvclaw.com
Telephone: (503) 241-7242
Attorney for AWEC

AWEC does not request paper service, unless required by WUTC rules or law. If permitted by the presiding officer, AWEC also requests that electronic service be provided to the following:

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

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

4 AWEC is an incorporated, non-profit association of large energy consumers in the Pacific Northwest. AWEC represents some of Puget Sound Energy’s (“PSE” or the “Company”) largest customers.

5 AWEC has a substantial interest in PSE’s Advice No. 2024-10, which the Company filed on March 22, 2024, and the purpose of which is to “increase the Annual Cap for total benefits available to customers for the remainder of the 2023-2024 Low Income Program Year.”¹ The Company’s proposed tariff revision could substantially and directly affect AWEC members who purchase power from PSE. Accordingly, AWEC requests leave to intervene in this proceeding to represent its members who would be affected by any change to PSE’s rates.

6 AWEC has extensive experience in proceedings before the Commission involving PSE. AWEC participated in the Company’s last general rate case (“GRC”), Dockets UE-220006/UG-220007, and is a party to the Company’s current GRC, Dockets UE-240004/UG-240005. AWEC has also been a party in many prior Company rate proceedings over the past decades, either under its own name or through its predecessor organizations the Industrial Customers of Northwest Utilities and the Northwest Industrial Gas Users. AWEC’s intervention in this proceeding will assist the Commission in resolving issues and will not unreasonably

¹ Advice No. 2024-10, Transmittal Letter at 1 (Mar. 22, 2024).

broaden the issues, burden the record, or delay this proceeding.

7 As described above, AWEC 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 AWEC to intervene in this proceeding.

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

Dated this 29th day of March, 2024.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Sommer J. Moser

Sommer J. Moser, OR State Bar No. 105260

Tyler C. Pepple, WA State Bar No. 50475

107 SE Washington St., Suite 430

Portland, Oregon 97214

Telephone: (503) 241-7242

sjm@dvclaw.com

tcp@dvclaw.com

Attorneys for the Alliance of Western Energy Consumers