BEFORE THE

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

| In the Matter of the Petition of |) DOCKET UE-200407 |
|--|----------------------------|
| |) DOCKET UG-200408 |
| Avista Corporation, d/b/a Avista Utilities | |
| | |
| For an Order Authorizing Deferral of Costs |) PETITION TO INTERVENE OF |
| and Benefits Associated with COVID-19 |) THE ALLIANCE OF WESTERN |
| Public Health Emergency. |) ENERGY CONSUMERS |
| |) |

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 dockets as an intervenor with full party status, as described in WAC § 480-07-340. The business address of AWEC is:

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

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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:

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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

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

AWEC is an incorporated, non-profit association of large energy consumers in the Pacific Northwest, including some of Avista Corporation's ("Avista" or the "Company") largest customers.

On May 4, 2020, Avista petitioned the Commission for an order authorizing the Company to "utilize deferred accounting for the net incremental costs associated with the recent COVID-19 public health emergency and the normal business costs not recovered due to the reduction in electricity and natural gas by its customers." The deferral of such costs for later ratemaking treatment would substantially and directly affect those of AWEC's members who purchase electricity and natural gas services from Avista. AWEC therefore requests leave to intervene in Dockets UE-200407 and UG-200408 to represent and take positions on behalf of its members who are affected by Avista's proposed deferral.

AWEC – by itself and through its predecessor organizations the Industrial Customers of Northwest Utilities and the Northwest Industrial Gas Users – has extensive experience in proceedings before the Commission involving Avista. AWEC participated in the Company's last general rate case, UE-190334/UG-190335, and has been a party in many prior Company rate proceedings over the past decades. AWEC'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.

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As described above, AWEC has a direct and substantial interest in this proceeding

that will not be adequately represented by any other party, and AWEC may be affected by any

Commission determination connected with this proceeding. Thus, it is in the public interest to

allow AWEC to intervene in this proceeding.

WHEREFORE, AWEC respectfully petitions the Commission for leave to

intervene in this proceeding.

Dated this 17th day of June, 2020.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

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