

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND	)	DOCKETS UE-190334 and
TRANSPORTATION COMMISSION	)	UG-190335 ( <i>Consolidated</i> )
	)	
Complainant,	)	
	)	PETITION TO INTERVENE OF
v.	)	THE ALLIANCE OF WESTERN
	)	ENERGY CONSUMERS
AVISTA CORPORATION d/b/a	)	
AVISTA UTILITIES	)	
	)	
<u>Respondent.</u>	)	

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 of AWEC is:

Alliance of Western Energy Consumers  
818 SW 3<sup>rd</sup> 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 and independent consultant 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  
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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. A list of AWEC members is included as Attachment A. AWEC represents some of Avista Corporation's ("Avista" or the "Company") largest customers.

5           On April 30, 2019, the Company filed its proposed electric and natural gas rate increases. The proposed rate changes 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 this docket to represent and take positions on behalf of its members who are affected by Avista's proposed rate increases.

6           AWEC – 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-170485/UG-170486, 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.

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 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.

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

Dated this 9th day of May, 2019.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

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Of Attorneys for the

Alliance of Western Energy Consumers

## ATTACHMENT A

### MEMBERS OF ALLIANCE OF WESTERN ENERGY CONSUMERS

Air Liquide  
Air Products  
AkzoNobel  
Alcoa  
Ampcor Rigid Plastics  
Axiall, Inc.  
Basic American Foods  
Boeing  
\*Boise Cascade, Inc.  
BYU Idaho  
Columbia Steel  
\*Darigold  
Dyno Nobel, Inc.  
Emerald Performance Materials  
Evraz, Inc.  
Freres Lumber Co.  
Georgia-Pacific  
Idahoan Foods  
\*Inland Empire Paper Co.  
Intel Corp  
International Paper  
Johnson Controls, Inc.  
JR Simplot  
Kaiser Aluminum Trentwood Facility  
Kapstone Kraft Paper  
Lamb Weston  
Legacy Health  
Microsoft Corporation  
Nippon Dynawave Packaging Co.  
Norpac Foods  
North Pacific Paper Co.  
Northwest Hardwoods  
NW Innovation Works  
On Semiconductor  
Oregon Health Sciences University  
Packaging Corporation of America  
Pendleton  
Ponderay Newsprint  
Precision Castparts  
REC Solar Grade Silicon LLC  
Schnitzer Steel

Shell Oil Products US  
Solvay Chemicals  
Supreme Perlite Co.  
Swanson Group  
Tesoro Refining and Marketing Co.  
Timber Products  
United States Gypsum Co.  
University of Oregon  
Wah Chang  
WestRock  
Weyerhaeuser NR Co.

*\*Denotes Avista Customers*