

**BEFORE THE WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

Washington Utilities and Transportation Commission,)	
)	Docket NO. UE-011595
Complainant,)	Docket NO. UE-030751
)	
v.)	Petition to Intervene
)	Citizens' Utility Alliance
Avista Corporation, d/b/a Avista Utilities,)	Spokane Neighborhood Action Programs
)	
Respondent.)	

The Citizens' Utility Alliance of Washington (CUA) and Spokane Neighborhood Action Programs (SNAP) hereby request permission to co-intervene in the above referenced proceeding. In support of this Petition to Intervene, the CUA and SNAP assert the following:

A. The CUA's business address is

Citizens' Utility Alliance
212 W. 2nd Ave
Spokane, WA 99201

SNAP's business address is:

Spokane Neighborhood Action Programs
2116 E. First Avenue
Spokane, WA 99202

B. The CUA and SNAP will be represented in this matter by Don André, Director of the Citizens' Utility Alliance and Assistant Director of SNAP. Don André is designated for service of all documents in this matter at the address of the Citizens' Utility Alliance office provided above.

C. The Citizens' Utility Alliance is a grassroots consumer advocacy group whose mission is to protect, educate and advocate for Washington's residential gas, electric, water, and telecommunications consumers. Specific purposes of the Alliance are to:

- .. Promote public policies that ensure affordable access to power and telecommunications service for all of Washington's citizens, especially low-income and vulnerable citizens.
- .. Organize Washington citizens so that they effectively advocate their views on important power, telecommunications and water issues.

- Promote energy conservation and renewable energy sources.
- Promote public policies that protect the privacy of Washington citizens, particularly Washington's telecommunications consumers, and protect consumers from telemarketing abuses.
- Expose and prevent utility fraud and work to hold offenders accountable.

The CUA currently has over 2,000 individual members. Due to its mission, purposes and membership, the CUA possesses a unique interest in the outcome of this proceeding.

Since 1966 SNAP, a private, non-profit community action agency, has been working to improve the lives of low-income people in Spokane County. Our mission: "*SNAP works for low income and vulnerable people by providing human services, housing, and economic opportunities in a manner which enhances dignity; and advocating for programs, policies, and resources that maximize individual capacities and promote strong communities.*" Due to its mission driven advocacy on behalf of low-income and vulnerable people, SNAP possesses a unique interest in the outcome of this proceeding.

D. The Citizens' Utility Alliance and SNAP have a special interest in this proceeding for the following reasons: (1) Alliance members and SNAP clients will be directly affected by rate increases that may result from this proceeding; and (2) this proceeding will set precedent as the first annual ERM prudence review.

E. No other party in this proceeding specifically represents low income and vulnerable people. No other party to this proceeding has either the extensive history of service to, or the close bonds with, the community as do SNAP and the CUA. No other grassroots based advocacy group is currently party to this proceeding.

F. The CUA and SNAP have no intention of unreasonably broadening the issues, burdening the record or delaying the proceeding through their intervention.

For the foregoing reasons, the CUA and SNAP request the Commission grant their motion to co-intervene in this matter.

July 2, 2003

Respectfully submitted,

Don André, Director
Citizens' Utility Alliance
212 W. 2nd Ave. Suite 100
Spokane, WA 99201

