

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,)	DOCKETS UE-220066 and UG-220067
)	
Complainant,)	AMENDED PETITION TO INTERVENE OF THE ALLIANCE OF WESTERN ENERGY CONSUMERS
v.)	
)	
PUGET SOUND ENERGY,)	(REDACTED)
)	
Respondent.)	
)	
)	
)	

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 dockets 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 and independent consultants 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 and represents some of Puget Sound Energy's ("PSE" or the "Company") largest customers. A list of AWEC's PSE-served members is included as Confidential Attachment A.

5 AWEC's member companies have a substantial interest in PSE's general rate case, which the Company filed on January 31, 2022. PSE requests a three-year rate plan with first-year rate overall rate impacts of 13.59% for electric customers and 12.98% for gas customers. The Company's proposed tariff revisions 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, UE-190529/UG-190530, and

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has 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 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 18th day of March, 2022.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Sommer J. Moser

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Of Attorneys for the

Alliance of Western Energy Consumers

Attachment A to AWEC's Amended Petition to Intervene has been designated as confidential per WAC 480-07-160, RCW 80.04.095 and per the Protective Order in Dockets UE-220066 and UG-220067. Attachment A has been redacted in its entirety.