

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,	)	DOCKETS UE-220053 and UG-220054 ( <i>Consolidated</i> )
	)	
Complainant,	)	
	)	
v.	)	ALLIANCE OF WESTERN ENERGY CONSUMERS' REQUEST FOR PAYMENT OF AVISTA CUSTOMER REPRESENTATION SUB-FUND GRANT
AVISTA CORPORATION d/b/a AVISTA UTILITIES,	)	
	)	
Respondent.	)	

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1                   Pursuant to Article 7.1 of the Washington Interim Participatory Funding Agreement (“IPFA”) approved by the Washington Utilities and Transportation Commission (“Commission”) in Order 01 in Docket U-210595, the Alliance of Western Energy Consumers (“AWEC”) hereby requests final payment of AWEC’s Avista Customer Representation Sub-Fund Grant in the amount of \$50,000.

2                   On January 21, 2022, Avista Corporation d/b/a Avista Utilities (“Avista”) filed its request for a general rate revision for both its gas and electric service. The Commission docketed these filings as UE-220053 and UG-220054 (“Proceeding”).

3                   On February 28, 2022, as required by Article 6.2 of the IPFA, AWEC filed its Request for Case Certification and Notice of Intent to Request a Fund Grant, which was also served on Avista and all parties of record in the Proceeding. In that filing, AWEC identified the Avista Customer Representation Sub-Fund as the account from which AWEC intended to request a Fund Grant.

4                   On March 24, 2022, the Commission granted AWEC’s Request for Case  
Certification, finding that AWEC demonstrated it is a non-profit organization that represents  
broad customer interests,<sup>1</sup> that “it can effectively represent the particular customers it seeks to  
represent,”<sup>2</sup> and that “the public interest is served by AWEC’s participation and [ ] no other party  
adequately represents the interests of industrial customers.”<sup>3</sup>

5                   On April 22, 2022, AWEC filed its Proposed Budget in this Proceeding, showing  
total estimated expenses of \$175,000 and seeking an Avista Customer Representation Sub-Fund  
Grant in the amount of \$50,000. The Commission issued Order 06 in these Dockets on May 27,  
2022, approving an Avista Customer Representation Sub-Fund Grant for AWEC in the amount  
of \$50,000.

6                   At this time, AWEC requests that the Commission authorize final payment of  
AWEC’s approved Sub-Fund Grant in Dockets UE-220053 and UG-220054 in the amount of  
\$50,000 from the 2022 Avista Customer Representation Sub-Fund. Pursuant to Article 7.1 of the  
IPFA, a “Request for Payment for Customer Access Funds may be made at the conclusion of an  
Eligible Proceeding.” While a final order has not yet been issued in this Proceeding, all process  
has concluded and parties are only awaiting the final order. Accordingly, AWEC considers the  
proceeding to have effectively concluded. Furthermore, as detailed in Confidential Exhibit A,  
attached hereto, AWEC has already incurred Eligible Expenses in excess of its approved budget  
in this Proceeding. Consequently, even if additional process were to occur following the final

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<sup>1</sup> Dockets UE-220053 and UG-220054, Order 05 at ¶ 21 (Mar. 24, 2022).

<sup>2</sup> *Id.* at ¶ 22.

<sup>3</sup> *Id.*

order in this Proceeding, the amount of AWEC's Request for Payment will not change. If, however, the Commission interprets the IPFA to require submission of Requests for Payment following a final order in a docket, AWEC respectfully requests that the Commission refrain from ruling on this Request until the final order has been issued.

7 This Request for Payment satisfies the requirements of the IPFA as follows:

**Article 7.1(a)** – The itemized expenses, payees, and hourly rates – including separately identified amounts for consultant or expert witness fees and travel expenses – are attached as Confidential Exhibit A.

**Article 7.1(b)** – AWEC has been an active participant in this Proceeding. AWEC reviewed the filings in this Proceeding, conducted discovery, participated in settlement discussions, and filed a brief. The expenses included in Confidential Exhibit A are reasonable and directly attributable to AWEC's participation in Dockets UE-220053 and UG-220054.

**Article 7.1(c)** – As set forth in this Request for Payment, AWEC has provided information sufficient to demonstrate that AWEC has complied with all conditions and requirements of its approved Sub-Fund Grant.

**Article 7.1(d)** – This Request for Payment constitutes a Request for Final Payment for the full amount of AWEC's approved budget in this Proceeding.

8 Accordingly, AWEC has satisfied the terms of the IPFA and respectfully requests that the Commission approve AWEC's Request for Final Payment in the amount of \$50,000 from the 2022 Avista Customer Representation Sub-Fund within 30 days of receiving this

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Request for Final Payment (or, for the reasons discussed in Paragraph 6 of this Request, within 30 days of issuance of the final order in this Proceeding), as provided in Article 7.6 of the IPFA.

Checks should be made payable to:

Alliance of Western Energy Consumers

Payment should be sent to:

Alliance of Western Energy Consumers  
c/o Tyler C. Pepple  
Davison Van Cleve, P.C.  
1750 S Harbor Way, Suite 450  
Portland, OR 97201

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Dated this 30th day of November, 2022.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

Tyler C. Pepple, WA State Bar No. 50475

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