

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of)	DOCKET UE-240433 & UG-240434
)	
PUGET SOUND ENERGY)	
)	PETITION TO INTERVENE OF
Petition for an Order Extending Filing and)	THE ALLIANCE OF WESTERN
Reporting Requirements under RCW)	ENERGY CONSUMERS
19.405.060 and 19.280.030, an Exemption)	
from the Requirements of WAC)	
480-90-238(4), 480-100-640(1))	
and 480-100-655(2), and Requiring the)	
<u>Filing of an Integrated System Plan.</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 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
3519 NE 15th Ave, #249
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:

Tyler C. Pepple
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3 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:

Nannette M. Moller
nmm@dvclaw.com
Paralegal for DVC

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

5 AWEC is an incorporated, non-profit association of large energy consumers in the
Pacific Northwest. AWEC represents some of Puget Sound Energy’s (“PSE” or “Company”) largest customers.

6 On June 5, 2024, Puget Sound Energy filed two petitions – one for natural gas and one for electric – seeking orders extending filing and reporting requirements under RCW 19.405.060 and 19.280.030, an Exemption from the Requirements of WAC 480-90-238(4), 480-100-640(1) and 480-100-655(2), and Requiring the Filing of an Integrated System Plan. In effect, PSE seeks orders extending the filing and reporting requirements for the following legacy planning documents: (1) gas integrated resource plan, (2) electric integrated resource plan, (3) Clean Energy Implementation Plan, and (4) Clean Energy Implementation Plan Public Participation Plan. PSE also petitions the Commission for an order directing it to file an Integrated System Plan, as that term is defined in the Washington Decarbonization Act for Large Combination Utilities, by January 1, 2027. In support of its Petition, PSE has included a workplan wherein it proposes to set Clean Energy Transformation Act (“CETA”) annual interim targets for 2026 and 2027 equal to the interim target approved by the Commission for 2025 (i.e.

63%). PSE's estimated "premium" costs for meeting its proposed 2026 and 2027 interim targets are \$100 million and \$140 million, respectively, and would not serve to support long-term resource acquisitions for CETA compliance.

7 The rate impacts associated with PSE's proposed "premium" cap on clean energy costs to meet interim targets are likely to be substantial, particularly when layered on top of the increased costs its customers are already facing under the Company's currently pending general rate case. Additionally, by PSE's own admission, the burden borne by customers would not support long-term CETA-compliant resource acquisition. The rate increases that would likely stem from the Commission's approval of PSE's work plan will be substantial and directly affect those AWEC members who purchase electricity from PSE. AWEC therefore requests leave to intervene in this docket to represent and take positions on behalf of its members who are affected by the Company's Planning Transition Workplan.

8 AWEC's attorneys and consultants have extensive experience in proceedings before the Commission involving Puget Sound Energy. They have represented AWEC or its members in many prior Company proceedings over the past decades, including its ongoing general rate case proceeding, Dockets UE-240004/UG-240005, its 2022 General Rate Case, Dockets UE-220066/UG-220067. PSE's 2021 Clean Energy Implementation Plan and subsequent updates, as well as various other proceedings. 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.

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

Dated this 1st day of July 2024.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Sommer M. Moser

Tyler C. Pepple, WA State Bar No. 50475

Sommer J. Moser, OR State Bar No. 105260

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