

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Joint Application of)
)
HYDRO ONE LIMITED and) DOCKET NO. UE-170970
AVISTA CORPORATION)
) WASHINGTON AND NORTHERN
For an Order Authorizing Proposed) IDAHO DISTRICT COUNCIL OF
Transaction.) LABORERS' PETITION TO
) INTERVENE
)

1. Pursuant to WAC 480-07-355, the Washington and Northern Idaho District Council of Laborers (“WNIDCL”) hereby petitions the Washington Utilities and Transportation Commission (“WUTC” or “Commission”) for leave to intervene in the above-captioned proceeding as an intervenor with full party status, as described in WAC 480-07-340. The business address of WNIDCL is:

Washington and Northern Idaho District Council of Laborers
P.O. Box 12917
Mill Creek, WA 98082-3556.

2. Danielle Franco-Malone of Schwerin Campbell Barnard Iglitzin & Lavitt LLP will represent WNIDCL in this proceeding and has filed a separate Notice of Appearance as required in WAC 480-07-345(2). All documents relating to this proceeding should be served on WNIDCL’s attorney at the following address:

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3. WNIDCL is a democratic labor organization that represents more than 10,750 members in Washington and Northern Idaho. Petitioner is an affiliate of the Laborers International Union of North America (“LiUNA”), which represents 500,000 members primarily employed in the construction industry, and is the 8th largest labor organization in the United States.

4. WNIDCL’s members have a substantial interest in Hydro and Avista’s proposed merger filed on September 14, 2017. Hydro and Avista’s proposed merger would substantially and directly affect approximately 100 WNIDCL members who perform work for construction contractors working on the Avista system, including NPL, Northstar Enterprises, Spokane Traffic Control, Max J Kuney, Gargo, and Lydig. Petitioner’s members work on numerous Avista construction projects in Washington.

5. Petitioner and its signatory construction contractors are parties to collective bargaining agreements with respect to the rates of pay, benefit packages, and employment conditions for certain construction workers employed on Avista projects.

6. As the bargaining representative of members employed by certain Avista construction contractors, WNIDCL’s intervention serves the public interest as well as the interests of its members. Petitioner and its members can provide relevant and necessary information related to the proceeding, including wage rates, training requirements, construction standards, local employment impacts, and workforce development investments. No other party can represent the interests of WNIDCL.

7. As described above, WNIDCL 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. WNIDCL’s

participation will not unreasonably broaden the issues or burden the record in this proceeding. Thus, it is in the public interest to allow WNIDCL to intervene in this proceeding.

8. WNIDCL respectfully petitions the Commission for leave to intervene in this proceeding to represent its members who would be affected by the merger of Hydro and Avista.

DATED this 17th day of October, 2017.

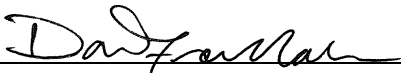


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CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of October, 2017, I caused to be served the foregoing Washington and Northern Idaho District Council Of Laborers' Petition To Intervene upon all parties of record in this proceeding, by electronic transmission to the email address of each party or party representative listed in the commission's master service list for this docket.

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