BEFORE THE

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

| WASHINGTON UTILITIES AND |) DOCKETS UE-190529 and |
|--------------------------|-------------------------------|
| TRANSPORTATION COMMISSIO | N,) UG-190530 (Consolidated) |
| |) |
| Complaina | nt,) |
| |) PETITION TO INTERVENE OF |
| V. |) THE ALLIANCE OF WESTERN |
| |) ENERGY CONSUMERS |
| PUGET SOUND ENERGY, |) |
| |) |
| Responde | ent.) |
| |) |

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

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:

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Tyler C. Pepple Davison Van Cleve, P.C. 1750 SW Harbor Way, Suite 450 Portland, OR 97201 tcp@dvclaw.com Telephone: (503) 241-7242 Attorney for AWEC

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Brent L. Coleman Davison Van Cleve, P.C. 1750 SW Harbor Way, Suite 450 Portland, OR 97201 blc@dvclaw.com Telephone: (503) 241-7242 Attorney for AWEC Riley G. Peck Davison Van Cleve, P.C. 1750 SW Harbor Way, Suite 450 Portland, OR 97201 rgp@dvclaw.com Telephone: (503) 241-7242 Attorney for AWEC

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 jog@dvclaw.com 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. A list of AWEC members is included as Attachment A. AWEC represents |
| | some of Puget Sound Energy's ("PSE" or the "Company") largest customers. |
| 5 | AWEC's member companies have a substantial interest in PSE's general rate |
| | case, which the Company filed on June 20, 2019. 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 | 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.

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WHEREFORE, AWEC respectfully petitions the Commission for leave to

intervene in this proceeding.

Dated this 9th day of July, 2019.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

<u>/s/Tyler C. Pepple</u> Tyler C. Pepple, WSBA # 50475 Brent L. Coleman, Colorado State Bar # 44400 1750 SW Harbor Way, Suite 450 Portland, Oregon 97201 Telephone: (503) 241-7242 tcp@dvclaw.com blc@dvclaw.com Of Attorneys for the Alliance of Western Energy Consumers

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ATTACHMENT A

MEMBERS OF ALLIANCE OF WESTERN ENERGY CONSUMERS

Airgas USA, LLC #Air Liquide #Air Products AkzoNobel Alcoa **#Amcor Rigid Plastics** Axiall, Inc. **Basic American Foods** #Boeing Boise Cascade, LLC BYU Idaho Columbia Steel Cost Management Services #Darigold Dyno Nobel, Inc. **Emerald Performance Materials, LLC** Evraz, Inc. Freres Lumber Co. #Georgia-Pacific Idahoan Foods **IGI** Resources Inland Empire Paper Co. #Intel Corp **#International Paper** J.R. Simplot Kaiser Aluminum Trentwood Facility Kapstone Kraft Paper Lamb Weston Legacy Health Linde, Inc. #Microsoft Corporation Norpac Foods #Northwest Hardwoods Packaging Corporation of America PCC Structurals Pendleton Ponderay Newsprint **REC Solar Grade Silicon LLC** Schnitzer Steel **#Shell Oil Products US** Solvay Chemicals

Supreme Perlite Co. Swanson Group #Tesoro Refining and Marketing Co. Timber Products, Inc. United Energy Trading United States Gypsum Wah Chang WestRock #Weyerhaeuser NR Co.

#Denotes PSE Customers