## BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Washington Utilities and Transportation		)	
Commission,		)	
	Complainant,	)	Docket NO. UE-991832
		)	
v.		)	
		)	
PacifiCorp,		)	
	Respondent.	)	

The NW Energy Coalition (NWEC) hereby requests permission to intervene as a party in the above referenced proceeding. In support of this Petition to Intervene, NWEC asserts the following:

A. NWEC's business address is:

NWEC 219 First Ave. South Suite 100 Seattle, WA 98104

- B. NWEC will be represented in this matter by Danielle Dixon. Danielle Dixon is designated for service of all documents in this matter at the address of the organizational offices provided above.
- C. NWEC is a not-for-profit corporation under section 501(c)(3) of the Internal Revenue Code. NWEC has approximately 200 individual members and 35 organizational members representing more than 300,000 citizens in Washington. NWEC's primary purpose is to promote an energy future that is reliable, affordable, and equitable with the least overall cost to society and our natural environment. Due to its historic and ongoing work with utility companies and others to achieve these goals, NWEC possesses unique interest in the outcome of this proceeding.
- D. NWEC has a special interest in this proceeding for the following reasons: (1) NWEC members share a fundamental interest in promoting investment in energy efficiency, new renewable resources, and weatherization of low-income homes, and PacifiCorp is proposing a system benefits charge to collect funds for investment in these public purposes; (2) NWEC members will be directly affected by rate changes and cost shifting among customer classes that may result from this proceeding; (3) rate design modifications that occur as a result of this proceeding may impact direct customer investment in energy conservation and energy efficiency; and (4) decisions made regarding this proceeding may set a precedent for decisionmaking in

future electric rate cases.

- E. NWEC intends to examine issues regarding investment in energy conservation and efficiency, renewable energy resources and low-income energy services, including both weatherization and bill assistance; rate design; and cost allocation.
- F. NWEC offers this process considerable expertise in the area of resource planning, industry structure, and economic and policy analysis. NWEC has participated in numerous rate cases, mergers, and resource planning proceedings in Oregon, Washington, Idaho, and Montana.
- G. NWEC has no intention of unreasonably broadening the issues, burdening the record or delaying the proceeding through its intervention.

For the foregoing reasons, NWEC requests the Commission grant its motion to intervene in this matter.

January 20, 2000

Respectfully submitted,

Sara Patton, Coalition Director NW Energy Coalition 219 First Ave. South Suite 100 Seattle, WA 98104

## CERTIFICATE OF SERVICE

I hereby certify that on this day, January 20, 2000, I have served a copy of the foregoing Motion to Intervene of the NW Energy Coalition by first class, U.S. Mail on the following persons:

Robert D. Cedarbaum Assistant Attorney General 1400 S. Evergreen Park Drive SW P.O. Box 40128 Olympia, WA 98504-0128

Simon ffitch Public Counsel Section Office of the Attorney General 900 Fourth Ave., Suite 2000 Seattle, WA 98164-1012

Anne Eakin/Mathew R. Wright Vice President, Regulation PacifiCorp 825 NE Multnomah, Suite 800 Portland, OR 97232

Jamie Van Nostrand Stoel Rives LLP Suite 3600, One Union Square 600 University Street Seattle, WA 98101

Stephen C. Hall Stoel Rives LLP 900 SW Fifth Ave, Suite 2600 Portland, OR 97204

Danielle O. Dixon

January 20, 2000

Carole Washburn
Executive Secretary
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION
1400 So. Evergreen Park Drive SW
P.O. Box 47250
Olympia, WA 98504

Re: PacifiCorp

Docket No. UE-991832

Dear Ms. Washburn:

Attached for filing with the Commission please find an original plus fourteen (14) copies of the NW Energy Coalition's petition to intervene in the above referenced proceeding. Because the Coalition operates on a Macintosh platform using MS Word, I e-mailed a copy of the petition to intervene to the Records Department rather than submitting a potentially unreadable disk copy.

Thank you for your assistance.

Sincerely,

Danielle Dixon Policy Associate NW Energy Coalition

Encl.

cc: all parties