## **BEFORE THE**

## WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Investigation of	) DOCKET UE-200069
	)
AVISTA CORPORATION d/b/a AVISTA	)
UTILITIES, PUGET SOUND ENERGY,	) PETITION TO INTERVENE OF
and PACIFICORP d/b/a PACIFIC POWER	) THE ALLIANCE OF WESTERN
& LIGHT COMPANY	) ENERGY CONSUMERS
	)
Regarding the 2020 Colstrip Coal Supply	, )
Agreement.	, )
<i>5</i>	, )
	<u>-</u> /

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 3<sup>rd</sup> 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:

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

1

2

Bradley G. Mullins 10147 Moratac Drive Tualatin, OR 97062 brmullins@mwanalytics.com Telephone: (503) 841-1465 Consultant for AWEC

PAGE 1 – PETITION TO INTERVENE OF AWEC

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

Corinne O. Milinovich Davison Van Cleve, P.C. 1750 SW Harbor Way, Suite 450

Portland, OR 97201 com@dvclaw.com

comedvelaw.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

4

5

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

AWEC is an incorporated, non-profit association of large energy consumers in the

Pacific Northwest. AWEC represents some of the largest customers of Avista Corporation

("Avista") and Puget Sound Energy ("PSE") in Washington.

On January 30, 2020, Commission Staff filed its petition requesting that the

Commission initiate an investigation into "(1) the prudency of the increased costs in connection

with the new coal supply agreement at Colstrip Units 3 and 4; and (2) the allocation of costs and

benefits associated with Owners' plan to apply pre-combustion additives to coal burned at Units

3 and 4 in order to qualify for a Production Tax Credit." AWEC's member companies have a

substantial interest in Commission Staff's petition, which could affect the rates paid by AWEC

members taking service from PSE and Avista. Accordingly, AWEC requests leave to intervene

in this proceeding to represent its members who would be affected by any change to PSE's and

Avista's rates.

PAGE 2 – PETITION TO INTERVENE OF AWEC

DAVISON VAN CLEVE, P.C. 1750 SW Harbor Way, Suite 450 Portland, OR 97201 Telephone: (503) 241-7242 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.

WHEREFORE, AWEC respectfully petitions the Commission for leave to

intervene in this proceeding.

7

Dated this 25th day of February, 2020.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

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

PAGE 3 – PETITION TO INTERVENE OF AWEC

DAVISON VAN CLEVE, P.C. 1750 SW Harbor Way, Suite 450 Portland, OR 97201 Telephone: (503) 241-7242