

**BEFORE THE**  
**WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of	)	DOCKET UE-200780
	)	DOCKET UG-200781
PUGET SOUND ENERGY,	)	
	)	PETITION TO INTERVENE OF
For an Order Authorizing Accounting for	)	THE ALLIANCE OF WESTERN
Costs Associated with COVID-19 Public	)	ENERGY CONSUMERS
Health Emergency.	)	
_____	)	

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  
818 SW 3<sup>rd</sup> Avenue #266  
Portland, OR 97204

2 AWEC will be represented in these proceedings by Davison Van Cleve, P.C. (“DVC”). All documents relating to these proceedings should be served on AWEC’s attorneys at the following addresses:

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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  
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Paralegal for DVC

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

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

17 On September 3, 2020, PSE petitioned the Commission for an order authorizing the Company to defer the costs and foregone revenue net of offsets associated with the COVID-19 public health emergency. The deferral of such costs for later ratemaking treatment would substantially and directly affect those of AWEC’s members who purchase electricity and natural gas services from PSE. Accordingly, AWEC requests leave to intervene in Dockets UE-200780 and UG-200781 to represent its members who would be affected by any change to PSE’s rates and programs.

18 AWEC – on its own and through its predecessor organizations the Industrial Customers of Northwest Utilities and the Northwest Industrial Gas Users – has extensive experience in proceedings before the Commission involving PSE. AWEC participated in the Company’s last general rate case, UE-190529/UG-190530, and has been a party to many Company rate proceedings over the past decades. 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.

19                   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.

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

Dated this 14th day of September, 2020.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

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