

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

|   |   |                              |
|---|---|------------------------------|
| WASHINGTON UTILITIES AND<br>TRANSPORTATION COMMISSION | ) | DOCKET UE-220376             |
|   | ) |                              |
|   | ) |                              |
| Complainant,  | ) | PETITION TO INTERVENE OF THE |
|   | ) | ALLIANCE OF WESTERN ENERGY   |
| v.  | ) | CONSUMERS                    |
|   | ) |                              |
| PACIFICORP, d/b/a PACIFIC POWER &<br>LIGHT COMPANY,   | ) |                              |
|   | ) |                              |
|   | ) |                              |
| Respondent.   | ) |                              |

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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 docket 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 this proceeding by Davison Van Cleve, P.C. (“DVC”). All documents relating to this proceeding 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  
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. AWEC represents some of Pacific Power & Light Company's ("Pacific Power" or the "Company") largest customers in Washington.

5 On June 6, 2022, the Staff of the Washington Utilities and Transportation Commission ("Staff") filed a complaint against PacifiCorp alleging the Company's Clean Energy Implementation Plan ("CEIP") failed to account for the social cost of greenhouse gas emissions ("SCGHG"), in violation of statute, Commission rule and the Commission's Order 01 in Docket UE-210829. Accordingly, Staff requests a Commission order directing the Company to rerun its CEIP model to incorporate these SCGHGs and further requests that the Commission consider a maximum penalty against PacifiCorp in the amount of one thousand dollars per day for each of the Company's violations.<sup>1</sup> Staff calculates that as of May 25, 2022, PacifiCorp has incurred penalties totaling \$730,000 and that further penalties should be assessed each additional day the CEIP is not revised.<sup>2</sup>

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<sup>1</sup> Docket UE-220376, Staff Complaint ¶ 25 (June 6, 2022).

<sup>2</sup> *Id.*

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The outcome of this proceeding could directly affect those of AWEC's members who purchase electricity from PacifiCorp. If granted by the Commission, Staff's requested relief could result in significant impacts on resource procurement compared to the Company's current CEIP, the costs of which may flow through to customers in future years. AWEC therefore requests leave to intervene in this docket to represent and take positions on behalf of its members who are affected by any change to Pacific Power's rates and programs.

7

AWEC's representatives have extensive experience in proceedings before the Commission involving PacifiCorp, including participation in the Company's current CEIP proceeding, Docket UE-210829, and in many prior Company rate proceedings over the past decades. AWEC is also a regular party to other Commission proceedings affecting each of the electric and natural gas utilities the Commission regulates. 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.

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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.

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

Dated this 27th day of June, 2022.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Sommer J. Moser

Sommer J. Moser, OR State Bar No. 105260

Tyler C. Pepple, WA State Bar No. 50475

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