

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

WASHINGTON UTILITIES AND	)	DOCKET UE-250224
TRANSPORTATION COMMISSION,	)	
	)	
Complainant,	)	PETITION TO INTERVENE OF
	)	THE ALLIANCE OF WESTERN
v.	)	ENERGY CONSUMERS
	)	
PACIFICORP d/b/a PACIFIC POWER &	)	
LIGHT COMPANY,	)	
	)	
Respondent.	)	
_____	)	

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 for AWEC is:

Alliance of Western Energy Consumers  
3519 NE 15<sup>th</sup> Ave, Suite 249  
Portland, OR 97212

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 and consultant at the following addresses:

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Consultant for AWEC

3                   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:

Julitta L. Brannon  
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Paralegal for DVC

4                   The administrative rules at issue are WAC § 480-007-304, -355.

5                   AWEC is an incorporated, non-profit association of large energy consumers in the  
Pacific Northwest. AWEC represents some of PacifiCorp's (or "Company") largest customers.

6                   On April 1, 2025, the Company filed its 2025 Power Cost Only Rate Case  
("PCORC"), the purpose of which is to "reset the baseline to remove coal-fired resources from  
rates."<sup>1</sup> The Company is also proposing a new allocation methodology to allocate the cost of  
resources to Washington customers. The Company filed the PCORC in compliance with Order  
09 in Docket No. UE-230172.<sup>2</sup>

7                   The Company's PCORC could substantially and directly affect AWEC members  
who purchase electric services from the Company. Accordingly, AWEC requests leave to  
intervene in this proceeding to represent its members who would be affected by any change to  
Company's rates.

8                   AWEC has extensive experience in proceedings before the Commission involving

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<sup>1</sup> UE-250224, Transmittal Letter at 2 (April 1, 2025).

<sup>2</sup> UE-230172, Commission Order 09 at ¶ 14 (May 16, 2024).

Company. AWEC participated in the Company's 2022 Power Cost Adjustment Mechanism proceeding, Docket UE-230482, its last general rate case ("GRC"), Dockets UE-230172/UE-210852 (consolidated), and has been a party in many prior Company rate proceedings over the past decades, either under its own name or through its predecessor organizations the Industrial Customers of Northwest Utilities and the Northwest Industrial Gas Users. 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.

9 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.

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

Dated this 10th day of April, 2025.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

*/s/ Tyler C. Pepple*

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