

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

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|--|---|------------------------------|
| In the Matter of |) | DOCKET UE-210447 |
| |) | |
| PACIFICORP d/b/a PACIFIC POWER & LIGHT COMPANY, |) | PETITION TO INTERVENE OF THE |
| |) | ALLIANCE OF WESTERN ENERGY |
| 2020 Power Cost Adjustment Mechanism. |) | CONSUMERS |
| _____ |) | |

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 3rd 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 and independent consultant 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 15, 2021, Pacific Power filed its 2020 Power Cost Adjustment Mechanism ("PCAM"), the purpose of which is to allow the Company to track unexpected variations in power costs in a PCAM deferral account. How such costs are calculated will substantially and directly affect those of AWEC's members who purchase electricity from Pacific Power. 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.

6 AWEC's representatives have extensive experience in proceedings before the Commission involving Pacific Power, including participation in the Company's last general rate case, UE-191024, 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

PAGE 2 – PETITION TO INTERVENE OF AWEC

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Commission in resolving issues and will not unreasonably broaden the issues, burden the record, or delay this proceeding.

7 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.

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

Dated this 23rd day of June, 2021.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

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Brent L. Coleman, CO State Bar No. 44400

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