

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of)	DOCKET UG-230756
)	
PUGET SOUND ENERGY,)	PETITION TO INTERVENE OF THE
)	ALLIANCE OF WESTERN ENERGY
Natural Gas Tariff Filing, Advice No. 2023-40.)	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 for 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 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

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 and represents some of Puget Sound Energy’s (“PSE” or the “Company”)
largest customers.

5 AWEC’s member companies have a substantial interest in PSE’s proposed
revisions to rates under natural gas Schedule 111, Greenhouse Emissions Cap and Invest
Adjustment, the purpose of which is to recover Climate Commitment Act allowance costs that
have been or will be deferred from January 2023 through September 2023. The rate impacts of
PSE’s proposed rate revisions could substantially and directly affect AWEC members who take
natural gas service from PSE. Accordingly, AWEC requests leave to intervene in this
proceeding to represent its members who would be affected by any change to PSE’s rates and
programs.

6 AWEC has extensive experience in proceedings before the Commission involving
PSE. AWEC participated in the Company’s last general rate case, UE-220066/UG-220067, 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.

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 may be affected by any

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Commission determination made in connection 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 28th day of September, 2023.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Sommer J. Moser

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