## BEFORE THE

## WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

| WASHINGTON UITILITIES AND | ) DOCKETS UE-200900 and    |
|---------------------------|----------------------------|
| TRANSPORTATION COMMISSION | ) UG-200901 (Consolidated) |
| Complainant,              |                            |
| Complanain,               | ) PETITION TO INTERVENE OF |
| V.                        | ) THE ALLIANCE OF WESTERN  |
| ٧.                        | ) ENERGY CONSUMERS         |
|                           | ) ENERGY CONSUMERS         |
| AVISTA CORPORATION d/b/a  | )                          |
| AVISTA UTILITIES          | )                          |
|                           | )                          |
| Respondent.               | )                          |
|                           |                            |

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

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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DAVISON VAN CLEVE, P.C. 1750 SW Harbor Way, Suite 450 Portland, OR 97201 Telephone: (503) 241-7242 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

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

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

On October 29, 2020, the Company filed its proposed electric and natural gas rate increases of \$44.2 million, or 8.3%, in electric base revenues, and \$12.8 million, or 12.2%, in natural gas base revenues. The proposed rate changes would substantially and directly affect those of AWEC's members who purchase electricity and natural gas services from Avista.

AWEC therefore requests leave to intervene in this docket to represent and take positions on behalf of its members who are affected by Avista's proposed rate increases.

AWEC – 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 Avista. AWEC participated in the Company's last general rate case, UE-190334/UG-190335, and has been a party in many prior Company rate proceedings over the past decades. AWEC's intervention in this proceeding will assist the

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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 3rd day of December, 2020.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Brent L. Coleman

Brent L. Coleman, CO State Bar No. 44400

Corinne O. Milinovich, OR State Bar No. 194200

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