

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,	)	DOCKET UG-210755
	)	
Complainant,	)	PETITION FOR CASE
	)	CERTIFICATION AND NOTICE OF
v.	)	INTENT TO REQUEST FUND GRANT
	)	OF THE ALLIANCE OF WESTERN
CASCADE NATURAL GAS	)	ENERGY CONSUMERS
CORPORATION	)	
	)	
Respondent.	)	
_____	)	

**I. INTRODUCTION**

1. Pursuant to Order 01 issued by the Washington Utilities and Transportation Commission (“Commission”) in Docket No. U-210595, and Articles 5.2.1 and 6.2 of the Washington Interim Participatory Funding Agreement (“Funding Agreement”), Alliance of Western Energy Consumers (“AWEC”) files this Petition for Case Certification (“Petition”) and Notice of Intent to Request Fund Grant (“Notice”) in the above-referenced docket.
2. As required by Article 6.2 of the Funding Agreement, AWEC is filing this Petition and Notice at the time designated by the Commission in the Second Prehearing Conference Order in this Docket. AWEC is also serving this Petition and Notice on Cascade and each party to the proceeding.
3. Pursuant to Article 6.2 of the Funding Agreement, AWEC identifies the Cascade Customer Representation Sub-Fund as the fund from which AWEC requests a Fund Grant.

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AWEC will file a Proposed Budget within 30 days of the Commission’s decision on the Petition and Notice as provided Second Prehearing Conference Order in this Docket.

4. Cascade’s general gate case requesting a base rate increase of more than \$13 million for gas distribution service qualifies as an “Eligible Proceeding.” Cascade is a Participating Public Utility under the Funding Agreement. Additionally, this case will be carried out under the public service laws, namely RCW 80.28.020, among others, and the outcome of this proceeding and Cascade’s request to increase charges and rates for natural gas service in Washington will materially affect the public interest.

5. Under Article 5.1 of the Funding Agreement, “[o]nly parties that are case-certified for a particular proceeding will be eligible to receive Fund Grants.” Article 5.2.1 of the Funding Agreement provides the criteria necessary for being case-certified to receive Fund Grants from the Customer Representation Sub-Fund. AWEC meets each of these criteria.

6. First, AWEC is a non-profit organization formed for the benefit of its members. AWEC is neither a for-profit organization nor a governmental entity.

7. Second, AWEC represents broad customer interests. AWEC represents the class of industrial customers that take natural gas service from Cascade, and has several members that are Cascade customers. While the Commission declined to specifically define what constitutes “broad customer interests” in its Policy Statement on Participatory Funding for Regulatory Proceedings, RCW 80.28.430(1), the statute authorizing the Funding Agreement, explicitly states that “broad customer interests” include industrial customers.

8. Third, AWEC has demonstrated in numerous past proceedings that it is able to effectively represent Cascade’s industrial customers. AWEC (or its predecessor Northwest Industrial Gas

Users) has been granted intervention and has fully participated, in Cascade's rate cases for more than 20 years. AWEC routinely sponsors expert witnesses that identify numerous adjustments to Cascade's proposed revenue requirement. AWEC's advocacy has directly resulted in lower energy costs for industrial customers and all other customer classes.

9. Fourth, no other party to this proceeding (and, thus, no other stakeholder that could be case-certified) adequately represents the interests of industrial customers. The Commission affirmatively determined this when it granted AWEC's petition to intervene in this proceeding. Moreover, as demonstrated above, the specific interests of industrial customers and the public interest will benefit from AWEC's participation in this proceeding.

10. Finally, AWEC's request for case certification will not unduly delay this proceeding. The Commission has already approved a schedule for this proceeding, including a due date for the Petition and Notice.

11. Accordingly, AWEC respectfully requests that its Petition be granted as provided in the Agreement.

DATED: March 14, 2022.

Respectfully submitted,



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