

BEFORE THE WASHINGTON

UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION

Complainant,

v.

PACIFICORP d/b/a PACIFIC POWER &
LIGHT COMPANY

Respondent.

DOCKETS UE-230172

NW ENERGY COALITION’S PETITION
FOR CASE CERTIFICATION AND
NOTICE OF INTENT TO REQUEST A
FUND GRANT

1. Pursuant to the Washington Extended Interim Participatory Funding Agreement (the “Funding Agreement”) approved by the Washington Utilities and Transportation Commission (the “Commission”) on February 9, 2023 in Docket U-210595,¹ NW Energy Coalition (“NVEC” or the “Coalition”) hereby submits this Petition for Case Certification and Notice of Intent to Request a Fund Grant.
2. As required by Article 6.2 of the Extended Interim Agreement, NVEC is filing this Petition and Notice in advance of the time designated by the Commission. NVEC is also serving this Petition and Notice on PacifiCorp and each party to the proceeding.
3. Pursuant to Article 6.2, NVEC identifies the PacifiCorp Customer Representation Sub-Fund² as the fund from which NVEC requests a Fund Grant. NVEC will file a Proposed

¹ *In re Petition for Approval of an Interim Participatory Funding Agreement Pursuant to RCW 80.28.430*, Docket No. U-210595, Order No. 02 (Feb. 9, 2023).

² *See Interim Funding Agreement § 4.2* (Feb. 16, 2023).

Budget within 30 days of the date of the Prehearing Conference in these dockets, or at such other time designated by the Commission.

4. NWEC requests certification as a customer representative organization pursuant to section 5.2.1 and 6.2 of the Funding Agreement. NWEC meets the criteria for certification found in section 5.2.1:
 - a. NWEC is a non-profit organization.
 - b. NWEC represents broad customer interests. NWEC is an alliance of more than 100 organizations, including more than 40 in Washington State, and individual members. The Coalition's work focuses on energy efficiency, renewable energy, low-income and consumer protections, and informed public involvement in building a clean and affordable energy future – matters of broad customer interests in the State of Washington. NWEC focuses its regulatory engagement on issues that have a material impact on customer-side resources, energy efficiency, demand response, compliance with environmental and clean energy policies, and ensuring fair and equitable distribution of benefits to all customers, including low-income customers, vulnerable populations and highly impacted communities.
 - c. NWEC is able to effectively represent customers. NWEC routinely participates in Commission proceedings related to PacifiCorp customers' interests in the above matters. NWEC staff and members participate in meetings of PacifiCorp's Integrated Resource Plan Advisory Groups. NWEC regularly provides informal input and submits formal comments on PacifiCorp's energy efficiency programs, low-income rate programs, transportation electrification programs, and CETA implementation. NWEC has intervened in prior rate proceedings before the Commission, including,

most recently, Avista Corporation's general rate case, Docket UE-220053, and contributed materially to the record in that case. NWECC's lead legal counsel has represented clients in Commission proceedings for over twenty years.

- d. No other case-certified stakeholder participating in this proceeding, or proposing to intervene as of the date of this filing, adequately represents the specific interests of NWECC. NWECC is the only party focused on the interests of customers as they relate to customer-side resources, energy efficiency, and clean energy access. The public interest will benefit from NWECC's participation in this proceeding by allowing for the Commission to consider expert testimony on the topics for which NWECC is seeking to intervene. Through intervention and participation in Commission proceedings concerning rates, policy statements, and rulemakings over the past four decades, NWECC's activities have directly and materially benefited the public interest. These activities demonstrate that NWECC can effectively advance the general public interest in fair, just, reasonable, and equitable rates and practices.
- e. As demonstrated by its track record participating in general rate cases and other proceedings, NWECC's participation will not unduly delay this proceeding.

- 5. For the foregoing reasons, NWECC respectfully requests that the Commission grant this Petition for Case Certification and accept its Notice of Intent to Request a Fund Grant.

Dated this 12th day of May 2023.

Respectfully submitted,

/s/ Joni Sliger

Joni Sliger, WA State Bar No. 51631

Sanger Law P.C.

4031 SE Hawthorne Blvd

Portland, OR 97214

joni@sanger-law.com

Telephone: 971-930-2813

Fax: 503-334-2235

Of Attorneys for the NW Energy Coalition