

**BEFORE THE WASHINGTON STATE
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND)	DOCKET NO. UE-152253
TRANSPORTATION COMMISSION)	
)	
Complainant,)	PETITION TO INTERVENE
)	OF THE ENERGY PROJECT
v.)	
)	
PACIFIC POWER & LIGHT)	
COMPANY,)	
)	
Respondent.)	
.....))	

COMES NOW, Petitioner The Energy Project, by and through its undersigned legal counsel, and pursuant to WAC 480-07-355, respectfully petitions for the right to intervene as a party to the above-captioned proceeding, with all rights and responsibilities appurtenant thereto as described in WAC 480-07-340.

Pursuant to WAC 480-07-355, Petitioner offers the following information:

- (i) The Petitioner’s name and address is

The Energy Project
Opportunity Council
3406 Redwood Ave.
Bellingham, WA, 98225

The Energy Project will be represented in this matter by Brad M. Purdy. All documents pertaining to this proceeding should be sent to:

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- (ii) The administrative rules at issue are WAC Sections 480-07-340 through 355.

(iii) The Energy Project is a division of the Opportunity Council, a non-profit organization, and advocates statewide on behalf of community action agencies for programs that help to provide affordable access to essential home energy services for low-income households. Among others, The Energy Project represents the interests of The Opportunities Industrialization Center of Washington (“OIC”), a community action agency located at 815 Fruitdale Blvd., Yakima, WA, 98902-1467. OIC, and the low-income individuals it assists, are located in Pacific Power and Light’s service territory. OIC has unique knowledge and experience pertinent to this proceeding by providing services to low-income households. The Energy Project has previously intervened in numerous other proceedings on a regular basis before this Commission, including Pacific Power and Light rate cases. The Energy Project is a partner between the Washington State Community Action Partnership and the Washington Department of Community, Trade and Economic Development.

For the reasons listed herein, the intervention of The Energy Project in this proceeding is in the public interest. The Energy Project requests that the Commission grant its petition to intervene in this matter.

(iv) Though Petitioner has not yet had ample opportunity to fully assess all matters in controversy and formulate a precise position on such matters, Petitioner generally takes the position that the proposed revenue requirement increase will have a profound impact on all of Pacific Power and Light’s residential customers, including those who are considered “low-income.” Also of importance and potential concern is the manner in which PPL has proposed to expedite the ratemaking process. This important transition is in a critical state of formulation and input from all stakeholders, including the Energy Project, is essential as decisions made in this and similar other cases might well revise the long-standing process of utility ratemaking.

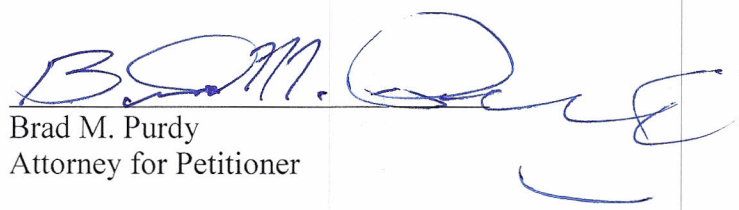
There appear to be numerous other issues relevant to residential, low-income customers including, but not limited to, customer relations issues and associated fees and charges as well as issues pertinent to the future of the Company's low-income bill assistance ("LIBA") program.

The overall impact of the Company's filing will be to increase the number of households unable to afford electricity service, reduce the relative number of households that agencies providing assistance (including, *inter alia*, weatherization measures) to PacifiCorp customers will be able to assist, and reduce the effectiveness of the programs such agencies offer to lower energy bills.

(v) The Energy Project has a direct and substantial interest in this proceeding, will assist the Commission in resolving the issues, and will not unduly broaden the issues or delay the proceeding.

(vi) WHEREFORE, The Energy Project respectfully petitions the Commission for leave to intervene in this proceeding.

DATED, this 18th day of December, 2015.


Brad M. Purdy
Attorney for Petitioner