

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,	)	DOCKETS UE-180899 and UG-180900 ( <i>Consolidated</i> )
	)	
Complainant,	)	PETITION TO INTERVENE OF THE
	)	ALLIANCE OF WESTERN ENERGY
v.	)	CONSUMERS
	)	
PUGET SOUND ENERGY,	)	
	)	
Respondent.	)	
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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 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

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 and independent consultant 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

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

17                   AWEC is an incorporated, non-profit association of large energy consumers in the Pacific Northwest. A list of AWEC members is included as Attachment A. Many members of AWEC purchase power from Puget Sound Energy (“PSE or the “Company”), as indicated on Attachment A.

18                   On November 7, 2018, PSE filed an update to its electric and natural gas rates as an expedited rate filing (“ERF”), in which the Company requested a Commission order authorizing PSE to increase rates by \$18.9 million, or 0.9%, for electric customers, and \$21.7 million, or 2.7%, for natural gas customers. AWEC’s member companies have a substantial interest in PSE’s request, as PSE’s ERF would affect the cost of taking electric and gas service from PSE. AWEC requests leave to intervene in this proceeding to represent its members who are affected by the proposed rates.

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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 made in connection with this proceeding. AWEC's participation will not unnecessarily broaden the issues or burden the record in this proceeding. Thus, it is in the public interest to allow AWEC to intervene in this proceeding.

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WHEREFORE, AWEC respectfully petitions the Commission for leave to intervene in this proceeding.

Dated this 15th day of November, 2018.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

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Of Attorneys for the

Alliance of Western Energy Consumers

## **ATTACHMENT A**

### **MEMBERS OF ALLIANCE OF WESTERN ENERGY CONSUMERS**

Airgas USA, LLC  
#Air Liquide  
#Air Products  
AkzoNobel  
Alcoa  
#Amcor Rigid Plastics  
Axiall, Inc.  
Basic American Foods  
#Boeing  
Boise Cascade, LLC  
BYU Idaho  
Columbia Steel  
Cost Management Services  
#Darigold  
Dyno Nobel, Inc.  
Emerald Performance Materials, LLC  
Evraz, Inc.  
Freres Lumber Co.  
#Georgia-Pacific  
Idahoan Foods  
IGI Resources  
Inland Empire Paper Co.  
#Intel Corp  
#International Paper  
J.R. Simplot  
Kaiser Aluminum Trentwood Facility  
Kapstone Kraft Paper  
Lamb Weston  
Legacy Health  
Linde, Inc.  
#Microsoft Corporation  
Norpac Foods  
#Northwest Hardwoods  
Oregon Health & Sciences University  
Packaging Corporation of America  
PCC Structurals  
Pendleton  
Ponderay Newsprint  
REC Solar Grade Silicon LLC  
Schnitzer Steel  
#Shell Oil Products US

Solvay Chemicals  
Supreme Perlite Co.  
Swanson Group  
#Tesoro Refining and Marketing Co.  
Timber Products, Inc.  
United Energy Trading  
United States Gypsum  
Wah Chang  
WestRock  
#Weyerhaeuser NR Co.

*#Denotes PSE Customers*