BEFORE THE WASHINGTON STATE UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND) D	OCKET NOS. UE-120436 and
TRANSPORTATION COMMISSION,) U	G-120437 (Consolidated)
)	
Complainant,)	
) N	W ENERGY COALITION'S PETITION
VS.) T	O INTERVENE
)	
AVISTA CORPORATION d/b/a AVISTA)	
UTILITIES,)	
)	
Respondent.)	
	_)	

- 1. On May 9, 2012, at the pre-hearing conference in this matter, the NW Energy Coalition ("Coalition") orally moved for permission to intervene in these proceedings. The Coalition's motion was unopposed and granted by Administrative Law Judge Friedlander. Accordingly, the Coalition files this written motion to complete the record for its intervention. In support of its petition, the Coalition asserts the following:
- 2. The Coalition's business address and contact information is:

NW Energy Coalition 811 – 1st Avenue, Suite 305 Seattle, WA 98104 (206) 621-0094 | Phone (206) 621-0097 | Fax nancy@nwenergy.org

3. The Coalition will be represented in this matter by Todd D. True, Amanda W. Goodin, and Kristen L. Boyles, attorneys with the law firm Earthjustice, and Nancy Hirsh, the Coalition's Policy Director. Mr. True, Ms. Goodin, Ms. Boyles, and Ms. Hirsh are designated for service of

all documents in this matter. They will separately file notices of appearance with the Commission, as required by WAC 480-07-345(2). Earthjustice's address and contact information is as follows:

Todd D. True Amanda W. Goodin Kristen L. Boyles 705 Second Avenue, Suite 203 Seattle, WA 98104 (206) 343-7340 | Phone (206) 343-1526 | Fax ttrue@earthjustice.org agoodin@earthjustice.org kboyles@earthjustice.org

- 4. The Coalition is a non-profit organization under section 501(c)(3) of the Internal Revenue Code. The Coalition's primary purpose is to promote an energy future that is clean, reliable, affordable, and equitable. Due to its historic and ongoing work with utility companies and others to achieve these goals, the Coalition possesses a unique interest in the outcome of these proceedings.
- 5. The Coalition also has a special interest in these proceedings for the following reasons among others: (1) Coalition members may be affected by rate changes and cost shifting among customer classes that may result from these proceedings; (2) rate design modifications that occur as a result of these proceedings may affect customer investment in energy efficiency and impact low-income customers; and (3) Avista's filings address the company's efforts to comply with the Energy Independence Act (Initiative 937), which the Coalition helped develop and for which it has advocated. The Coalition intends to examine these and other issues in this proceeding.
- 6. The Coalition offers this process considerable expertise in the area of resource planning, industry structure, and economic and policy analysis. The Coalition has participated in numerous rate cases, mergers, and resource planning proceedings in Washington, Oregon, Idaho,

and Montana. The Coalition has participated in previous Avista general rate cases, including in the pending 2011 Docket Nos. UE-110876 and UG-110877.

- 7. The Coalition has no intention of unreasonably broadening the issues, burdening the record, or delaying the proceeding through its intervention.
- 8. The Coalition's petition to intervene is unopposed.
- For the foregoing reasons, the Coalition asks the Commission to grant its Petition to
 Intervene in this matter.

Respectfully submitted this 11th day of May, 2012.

TODD P. TRUE (WSB #12864)

AMANDA-W. GOODIN (WSB #41312)

KRISTEN L. BOYLES (WSB #23806)

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