

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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|--|---|--------------------------|
| In the Matter of |) | DOCKET UE-210795 |
| |) | |
| PUGET SOUND ENERGY, |) | |
| |) | PETITION TO INTERVENE OF |
| 2021 Draft Clean Energy Implementation |) | THE ALLIANCE OF WESTERN |
| Plan. |) | ENERGY CONSUMERS |
| _____ |) | |

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 docket 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 3rd 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 at the following addresses:

Tyler C. Pepple
Davison Van Cleve, P.C.
1750 SW Harbor Way, Suite 450
Portland, OR 97201
E-Mail: tcp@dvclaw.com
Telephone: (503) 241-7242
Of Attorneys for AWEC

Brent L. Coleman
Davison Van Cleve, P.C.
1750 SW Harbor Way, Suite 450
Portland, OR 97201
E-Mail: blc@dvclaw.com
Telephone: (503) 241-7242
Of Attorneys for AWEC

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
jog@dvclaw.com
Paralegal for DVC

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

4 AWEC is an incorporated, non-profit association of large energy consumers in the Pacific Northwest. AWEC represents some of Puget Sound Energy's ("PSE" or the "Company") largest customers.

5 On October 15, 2021, PSE submitted its 2021 Draft Clean Energy Implementation Plan, which could substantially and directly affect the conditions of service received, as well as the rates paid, by AWEC's members who purchase electricity and gas service from PSE. AWEC therefore requests leave to intervene in this docket to represent and take positions on behalf of its members who are affected by any change to PSE's rates and programs.

6 AWEC and its predecessor organizations, the Industrial Customers of Northwest Utilities and the Northwest Industrial Gas Users, have extensive experience in proceedings before the Commission involving PSE and have been parties to many prior Company rate proceedings over the past decades. AWEC's intervention in this proceeding will assist the Commission in resolving issues and will not unreasonably broaden the issues, burden the record, or delay this proceeding.

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DAVISON VAN CLEVE, P.C.
1750 SW Harbor Way, Suite 450
Portland, OR 97201
Telephone: (503) 241-7242

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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 connected with 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 1st day of November, 2021.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

Tyler C. Pepple, WA State Bar No. 50475

Brent L. Coleman, OR State Bar No. 206480

Davison Van Cleve, P.C.

1750 SW Harbor Way, Suite 450

Portland, OR 97201

E-Mail: tcp@dvclaw.com

btc@dvclaw.com

Telephone: (503) 241-7242

Of Attorneys for the

Alliance of Western Energy Consumers