

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:

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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 Avista Corporation's ("Avista" or the "Company") largest customers.

5 On October 30, 2020, Avista petitioned the Commission for an Order authorizing the Company to change its accounting for federal income tax expense from a normalization method to a flow-through method for certain plant basis adjustments. The Company states that its request will provide immediate benefits to customers and is proposing to defer such benefits for ratemaking treatment in Avista's next-filed general rate case. If approved, the Company's proposal would substantially and directly affect those of AWEC's members who purchase electricity and natural gas services from Avista. AWEC therefore requests leave to intervene in this docket to represent and take positions on behalf of its members who are affected by and change to Avista's rates and programs.

6 AWEC – on its own and through its predecessor organizations the Industrial Customers of Northwest Utilities and the Northwest Industrial Gas Users – has extensive experience in proceedings before the Commission involving Avista. AWEC participated in the

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Company's last general rate case, UE-190334/UG-190335, and has been a party in 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.

7 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.

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

Dated this 7th day of December, 2020.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Brent L. Coleman

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