## **BEFORE THE**

## WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

| In the Matter of the Petition of            | ) | DOCKETS UE-200895 and    |
|---|---|--------------------------|
|   | ) | UG-200896                |
| AVISTA CORPORATION, d/b/a                   | ) |                          |
| AVISTA UTILTIES,                            | ) |                          |
|   | ) | PETITION TO INTERVENE OF |
| For an Order Authorizing Avista to Change   | ) | THE ALLIANCE OF WESTERN  |
| its Accounting for Federal Income Tax       | ) | ENERGY CONSUMERS         |
| Expense for Certain Plant Basis Adjustments | ) |                          |
| and Deferral of Associated Change in Tax    | ) |                          |
| Expense.                                    | ) |                          |
|   | ) |                          |

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

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:

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

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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 jog@dvclaw.com Paralegal for DVC

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

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.

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

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.

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.

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