

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND)	DOCKET UE-190222
TRANSPORTATION COMMISSION)	
)	
Complainant,)	PETITION TO INTERVENE OF
)	THE ALLIANCE OF WESTERN
v.)	ENERGY CONSUMERS
)	
AVISTA CORPORATION d/b/a)	
AVISTA UTILITIES)	
)	
<u>Respondent.</u>)	

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 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
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. A list of AWEC members is included as Attachment A. AWEC represents some of Avista Corporation's ("Avista" or the "Company") largest customers.

5 On March 29, 2019, the Company filed its proposed energy recovery mechanism ("ERM"). The proposed ERM deferrals would substantially and directly affect the rates paid by AWEC members who purchase power 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 Avista's proposed rate increases.

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AWEC – 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 Company’s last general rate case, UE-170485/UG-170486, 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 9th day of May, 2019.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

Tyler C. Pepple, WSB No. 50475

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ATTACHMENT A

MEMBERS OF ALLIANCE OF WESTERN ENERGY CONSUMERS

Air Liquide
Air Products
AkzoNobel
Alcoa
Ampcor Rigid Plastics
Axiall, Inc.
Basic American Foods
Boeing
*Boise Cascade, Inc.
BYU Idaho
Columbia Steel
*Darigold
Dyno Nobel, Inc.
Emerald Performance Materials
Evraz, Inc.
Freres Lumber Co.
Georgia-Pacific
Idahoan Foods
*Inland Empire Paper Co.
Intel Corp
International Paper
Johnson Controls, Inc.
JR Simplot
Kaiser Aluminum Trentwood Facility
Kapstone Kraft Paper
Lamb Weston
Legacy Health
Microsoft Corporation
Nippon Dynawave Packaging Co.
Norpac Foods
North Pacific Paper Co.
Northwest Hardwoods
NW Innovation Works
On Semiconductor
Oregon Health Sciences University
Packaging Corporation of America
Pendleton
Ponderay Newsprint
Precision Castparts
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
United States Gypsum Co.
University of Oregon
Wah Chang
WestRock
Weyerhaeuser NR Co.

**Denotes Avista Customers*