

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION)	DOCKETS UE-220053 and UG-220054 (<i>Consolidated</i>)
)	
Complainant,)	
)	PETITION TO INTERVENE OF
v.)	THE ALLIANCE OF WESTERN
)	ENERGY CONSUMERS
AVISTA CORPORATION d/b/a)	
AVISTA UTILITIES)	
)	
Respondent.)	

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 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 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 consultants at the following addresses:

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6 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

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

8 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.

9 On January 21, 2022, the Company filed its proposed Two-Year Rate Plan, with
new base rates effective December 2022 for Rate Year 1 and December 2023 for Rate Year 2.
For Rate Year 1, the Company proposes an electric rate increase of \$52.9 million, or 9.6%, and a
natural gas rate increase of \$10.9 million, or 9.5%, to be offset by a "Residual Tax Customer
Credit," resulting in a net increase of 7.4% for electric operations and 2.5% for gas operations.
For Rate Year 2, Avista proposes an increase of \$17.1 million, or 2.8%, for electric rates and
\$2.2 million, or 1.7%, for natural gas rates. The Company's proposed rate changes would
substantially and directly affect those of AWEC's members who purchase electricity and natural
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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 Avista's proposed rate increases.

10 AWEC has extensive experience in proceedings before the Commission
involving Avista. AWEC participated in the Company's last two general rate cases,
11 UE-200900/UG-200901 and UE-190334/UG-190335, and has been a party in many prior
Company rate proceedings over the past decades, either under its own name or through its
predecessor organizations the Industrial Customers of Northwest Utilities and the Northwest
Industrial Gas Users. 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.

12 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.

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

Dated this 4th day of February, 2022.

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.

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