

**BEFORE THE**  
**WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION	)	DOCKETS UE-240006 and UG-240007 ( <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 3<sup>rd</sup> 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:

Tyler C. Pepple  
Davison Van Cleve, P.C.  
107 SE Washington St., Suite 430  
Portland, OR 97214  
E-Mail: tcp@dvclaw.com  
Telephone: (503) 241-7242  
Attorney for AWEC

Sommer J. Moser  
Davison Van Cleve, P.C.  
107 SE Washington St., Suite 430  
Portland, OR 97214  
E-Mail: sjm@dvclaw.com  
Telephone: (503) 241-7242  
Attorney for AWEC

Lance D. Kaufman  
4801 W. Yale Ave.  
Denver, CO 80219  
lance@westernecon.com  
Telephone: (541) 515-0380  
Consultant for AWEC

Bradley G. Mullins  
MW Analytics  
Tietotie 2, Suite 208  
Oulunsalo, Finland FI-90440  
E-Mail: brmullins@mwanalytics.com  
Consultant for AWEC

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 17, 2024, the Company filed its proposed Two-Year Rate Plan, with  
new base rates effective December 2024 for Rate Year 1 and December 2025 for Rate Year 2.  
For Rate Year 1, the Company proposes an electric rate increase of \$77.1 million, or 13.0%, and  
a natural gas rate increase of \$17.3 million, or 13.6%. For Rate Year 2, Avista proposes an  
increase of \$53.7 million, or 11.7%, for electric rates and \$4.6 million, or 3.2%, 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 gas services from Avista. AWEC

PAGE 2 – PETITION TO INTERVENE OF AWEC

DAVISON VAN CLEVE, P.C.  
107 SE Washington St., Suite 430  
Portland, OR 97214  
Telephone: (503) 241-7242

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, UE-220053/UG-220054 and UE-200900/UG-200901, 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.

11                   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.

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

Dated this 6th day of February, 2024.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Sommer J. Moser

Sommer J. Moser, OR State Bar No. 105260

Tyler C. Pepple, WA State Bar No. 50475

Davison Van Cleve, P.C.

PAGE 3 – PETITION TO INTERVENE OF AWEC

DAVISON VAN CLEVE, P.C.  
107 SE Washington St., Suite 430  
Portland, OR 97214  
Telephone: (503) 241-7242

107 SE Washington St., Suite 430  
Portland, OR 97214  
sjm@dvclaw.com  
tcp@dvclaw.com  
Telephone: (503) 241-7242

*Attorneys for the Alliance of Western Energy Consumers*

PAGE 4 – PETITION TO INTERVENE OF AWEC

DAVISON VAN CLEVE, P.C.  
107 SE Washington St., Suite 430  
Portland, OR 97214  
Telephone: (503) 241-7242