

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND)	DOCKETS UE-240461
TRANSPORTATION COMMISSION,)	
)	
Complainant,)	PETITION TO INTERVENE OF
)	THE ALLIANCE OF WESTERN
v.)	ENERGY CONSUMERS
)	
PACIFICORP d/b/a PACIFIC POWER &)	
LIGHT COMPANY)	
)	
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
3519 NE 15th Ave. #249
Portland, OR 97212

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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3 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:

Nannette M. Moller
nmm@dvclaw.com
Paralegal for DVC

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

5 AWEC is an incorporated, non-profit association of large energy consumers in the
Pacific Northwest. AWEC represents some of PacifiCorp's (or "Company") largest customers.

6 On June 14, 2024, the Company filed its 2023 Power Cost Adjustment
Mechanism (“PCAM”), the purpose of which is to allow the Company to track unexpected
variations in power costs in a PCAM deferral account. How such costs are calculated and passed
on to customers will substantially and directly affect those of AWEC’s members who purchase
electricity from PacifiCorp. AWEC therefore requests leave to intervene in this docket to
represent and take positions on behalf of its members who are affected by the Company’s rates
and programs.

7 AWEC’s attorneys and consultants have extensive experience in proceedings
before the Commission involving PacifiCorp. They have represented AWEC or its members in
many prior Company rate proceedings over the past decades, including its recent General Rate
Case, Docket UE-230172, its Power Cost Only Rate Case, Docket UE-210402, its Limited Issue
Rate Filing, Docket UE-210532, as well as its currently pending 2022 PCAM Filing, Docket
UE-230482. 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.

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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.

9

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

Dated this 11th Day of July 2024.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Sommer J. Moser

Sommer J. Moser, OR State Bar No. 105260

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