

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND)	DOCKET UE-200980
TRANSPORTATION COMMISSION)	
)	
Complainant,)	PETITION TO INTERVENE OF
)	THE ALLIANCE OF WESTERN
v.)	ENERGY CONSUMERS
)	
PUGET SOUND ENERGY,)	
)	
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 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 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. AWEC represents some of Puget Sound Energy's ("PSE" or the "Company") largest customers.

5 On December 9, 2020, PSE filed its power cost only rate case ("PCORC"), which "seeks approval of a new, adjusted Baseline Rate based upon projected normalized power costs for the proposed rate year for this PCORC." If approved, the Company's PCORC filing would increase electric rates by \$78.5 million, or approximately 3.9 percent. The proposed rate change would substantially and directly affect those of AWEC's members who purchase electricity from PSE. AWEC therefore requests leave to intervene in this docket to represent and take positions on behalf of its members who are affected by any change to PSE's rates and programs.

6 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 PSE. AWEC participated in the Company's last general rate case, UE-190529/UG-190530, as well as Docket UE-200115, and has been a party in many prior Company rate proceedings over the past decades. AWEC's

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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 16th day of December, 2020.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

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