

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,

Complainant,

v.

AVISTA CORPORATION, d/b/a  
AVISTA UTILITIES,

Respondent.

DOCKETS UE-220053 and UG-220054  
(Consolidated)

REQUEST FOR CASE  
CERTIFICATION AND NOTICE OF  
INTENT TO REQUEST A FUND  
GRANT

- 1 Pursuant to the Washington Interim Participatory Funding Agreement (Funding Agreement) approved by the Washington Utilities and Transportation Commission (Commission) on February 24, 2022 in Docket U-210595, The Energy Project (TEP) hereby submits this Request for Case Certification and Notice of Intent to Request a Fund Grant.
- 2 TEP provides this Notice of Intent to Request a Fund Grant from the Customer Representation Sub-Fund of the Customer Access Fund for Avista<sup>1</sup> pursuant to section 6.2 of the Funding Agreement.
- 3 TEP requests certification as a customer representative organization pursuant to section 5.2.1 and 6.2 of the Funding Agreement. TEP meets the criteria for certification found in section 5.2.1:
- a. TEP is fiscally sponsored by the Opportunity Council, which is a non-profit organization.
  - b. TEP represents the interests of low-income customers in the State of Washington, and RCW 80.28.430(1) recognizes “organizations representing low-income . . . customers” as a type of organization that represents “broad customer interests in regulatory proceedings.”
  - c. TEP focuses its regulatory engagement on issues that have a material impact on low-income customers and vulnerable populations. TEP works with entities delivering low-income services that are funded by the Washington State Department of Commerce, including Community Action Partnership Agencies that provide rate assistance and

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<sup>1</sup> See Funding Agreement § 4.2.  
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energy efficiency programs for Avista Corporation's (Avista's) low-income customers. TEP also works generally with utilities and other stakeholders to develop and expand rate assistance, energy efficiency programs, renewable energy projects, electric vehicle transportation infrastructure, and other matters impacting low-income customers in Washington. TEP can effectively represent the interests of low-income customers.

- d. TEP is the only party focusing solely on the interests of low-income customers in this proceeding. Through intervention and participation in Commission proceedings concerning rates, mergers, property transfers, policy statements, and rulemakings over the past two decades, TEP's activities have directly and materially benefited low-income customers. These activities demonstrate that TEP can effectively represent low-income customers and vulnerable populations to advance their specific interests, as well as the general public interest in fair, just, reasonable, and equitable rates and practices.
- e. TEP is a frequent party in general rate cases and other significant dockets before the UTC involving Washington investor-owned utilities when energy affordability, energy efficiency, and customer service policies are at issue. As demonstrated by its track record participating in general rate cases and other proceedings, TEP's participation will not unduly delay this proceeding.

4 For the foregoing reasons, TEP respectfully requests that the Commission grant this Request for Case Certification and accept its Notice of Intent to Request a Fund Grant.

DATED: February 25, 2022

By: /s/ Yochanan Zakai  
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\* Mr. Zakai is not a member of the State Bar of California.  
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