

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PACIFICORP d/b/a PACIFIC POWER
& LIGHT COMPANY,

Respondent.

DOCKET UE-210829

PETITION TO INTERVENE
OF THE ENERGY PROJECT

1 Pursuant to WAC 480-07-355(1), The Energy Project hereby petitions the Washington Utilities and Transportation Commission (Commission or UTC) for leave to intervene in the above-captioned docket as an intervenor. The Energy Project requests intervention with full party status as described in WAC 480-07-340.

2 The Energy Project will be represented in this proceeding by attorneys Yochanan Zakai and Ellison Folk. All documents relating to this proceeding should be served to Yochanan Zakai and Ellison Folk in electronic format only at:

Yochanan Zakai
SHUTE, MIHALY & WEINBERGER LLP
396 Hayes Street
San Francisco, California 94102
(415) 552-7272
yzakai@smwlaw.com

Ellison Folk
SHUTE, MIHALY & WEINBERGER LLP
396 Hayes Street
San Francisco, California 94102
(415) 552-7272
folk@smwlaw.com

3 Further, The Energy Project requests that a courtesy copy of service and correspondence relating to this matter be sent via e-mail to:

Sara L. Breckenridge
Legal Secretary
(415) 552-7272
breckenridge@smwlaw.com

4 The Energy Project works with utilities and other stakeholders to develop and expand rate assistance and energy efficiency programs for low-income customers and vulnerable populations in Washington. The Energy Project also works with Community Action Agencies that provide rate assistance and energy efficiency programs for PacificCorp’s low-income customers and services to vulnerable populations. The Energy Project is a frequent party in general rate cases and other significant dockets before the UTC involving Washington investor-owned utilities when equity, energy affordability, energy efficiency, and customer service policies are at issue. The Energy Project has an interest in the rate issues raised in PacificCorp’s filing and the potential impact on vulnerable populations, as well as low-income customers and programs.

5 The Energy Project has participated actively and filed comments in the pre-adjudication phase of this docket. The Energy Project’s prior comments discussed its concerns regarding the Clean Energy Implementation Plan’s impact low-income customers and vulnerable populations, including the scope and content of the proposed Customer Benefit Indicators and Specific Actions.

6 The Energy Project has a direct and substantial interest in PacificCorp’s filing in this docket and no other party will adequately represent those interests. The Energy Project will be the only party to focus solely on the interests of low-income customers and vulnerable populations in this proceeding. The Energy Project’s intervention will not unreasonably broaden the issues, burden the record, or delay the proceeding. Accordingly, it is in the public interest to allow The Energy Project to intervene in this docket.

7 For the foregoing reasons, The Energy Project respectfully petitions the Commission for leave to intervene in this proceeding.

DATED: May 1, 2023

By: /s/ Yochanan Zakai
Yochanan Zakai, Oregon State Bar No. 130369*
Ellison Folk
SHUTE, MIHALY & WEINBERGER LLP
396 Hayes Street
San Francisco, California 94102
(415) 552-7272
yzakai@smwlaw.com
folk@smwlaw.com

Attorneys for The Energy Project

* Mr. Zakai is not a member of the State Bar of California.
PETITION TO INTERVENE 3
DOCKET UE-210829