

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)

NW ENERGY COALITION’S REQUEST
FOR CASE CERTIFICATION AND
NOTICE OF INTENT TO REQUEST A
FUND GRANT

1. Pursuant to the Washington Interim Participatory Funding Agreement (the “Funding Agreement”) approved by the Washington Utilities and Transportation Commission (the “Commission”) on February 24, 2022, in Docket U-210595,¹ NW Energy Coalition (“NVEC” or the “Coalition”) hereby submits this Request for Case Certification and Notice of Intent to Request a Fund Grant.
2. NVEC provides this Notice of Intent to Request a Fund Grant from the Customer Representation Sub-Fund of the Customer Access Fund for Avista Corporation² pursuant to section 6.2 of the Funding Agreement.

¹ *In re Petition for Approval of an Interim Participatory Funding Agreement Pursuant to RCW 80.28.430*, Docket No. U-210595, Order No. 01 (Feb. 24, 2022); *see also* Order No. 04 at ¶ 10 (Mar. 1, 2022).

² *See* Interim Funding Agreement § 4.2 (Feb. 25, 2022).

3. NWEC requests certification as a customer representative organization pursuant to section 5.2.1 and 6.2 of the Funding Agreement. NWEC meets the criteria for certification found in section 5.2.1:

- a. NWEC is a non-profit organization.
- b. NWEC represents broad customer interests. NWEC is an alliance of more than 100 organizations, including more than 40 in Washington State, and individual members. The Coalition's work focuses on energy efficiency, renewable energy, low-income and consumer protections, and informed public involvement in building a clean and affordable energy future – matters of broad customer interests in the State of Washington. NWEC focuses its regulatory engagement on issues that have a material impact on customer-side resources, energy efficiency, demand response, compliance with environmental and clean energy policies, and ensuring fair and equitable distribution of benefits to all customers, including low-income customers, vulnerable populations and highly impacted communities.
- c. NWEC is able to effectively represent customers. NWEC routinely participates in Commission proceedings related to Avista customers' interests in the above matters. NWEC staff and members participate in meetings of Avista's Integrated Resource Plan Advisory Groups, the Energy Efficiency Advisory Group, and the Energy Assistance Advisory Group. NWEC regularly provides informal input and submits formal comments on Avista's energy efficiency programs, low-income rate programs, transportation electrification programs, and CETA implementation. NWEC has intervened in prior Avista rate proceedings, including, most recently, Docket UE-190334/UG-190335, and contributed materially to the record in that case. NWEC's

lead legal counsel has represented clients in Commission proceedings for over twenty years.

- d. No other case-certified stakeholder participating in this proceeding adequately represents the specific interests of NWECC. NWECC is the only party focused on the interests of customers as they relate to customer-side resources, energy efficiency, transportation electrification, and clean energy access. The public interest will benefit from NWECC's participation in this proceeding by allowing for the Commission to consider expert testimony on the topics in which NWECC has been approved to intervene without objection. Through intervention and participation in Commission proceedings concerning rates, policy statements, and rulemakings over the past four decades, NWECC's activities have directly and materially benefited the public interest. These activities demonstrate that NWECC can effectively advance the general public interest in fair, just, reasonable, and equitable rates and practices.
- e. As demonstrated by its track record participating in general rate cases and other proceedings, NWECC's participation will not unduly delay this proceeding.

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

Dated this 8th day of March 2022.

Respectfully submitted,

/s/ Irion Sanger

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