BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

AT&T COMMUNICATIONS OF THE PACIFIC NORTHWEST, INC.,

Complainant,

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VERIZON NORTHWEST, INC.,

Respondents.

DOCKET NO. UT-020406

PETITION OF THE CITIZENS' UTILITY ALLIANCE OF WASHINGTON TO INTERVENE PURSUANT TO WAC 480-09-430(1)

Pursuant to WAC 480-09-430(1) the Citizens' Utility Alliance of Washington petitions the Commission for consent to intervene in this matter. In support of its petition the Alliance states:

- The Citizens' Utility Alliance of Washington (Alliance), address of 212
 West Second Avenue, Suite 100, Spokane, WA 99201, requests
 permission to intervene in this proceeding.
- 2 By its intervention, the Alliance will not broaden the issues of the docket. This request is made pursuant to WAC 480-09-430(1).
- 3 Spokane Neighborhood Action Programs (SNAP), the Alliance's fiscal sponsor is a 501(c)(3) nonprofit corporation. SNAP works for low-income and vulnerable people by providing human services, housing, and economic opportunities in a manner that enhances dignity; and by advocating for programs, policies, and resources that maximize individual capacities and promote strong communities.

Throughout Spokane County, SNAP services improve the lives of families living in poverty, low-income elderly persons, and the homeless. For over thirty years, SNAP has served as a resource and advocate for these groups. As a community action agency, SNAP's board consists of one- third elected officials, one-third low-income representatives, and one-third residents of the community at large.

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The Alliance is a statewide program of SNAP. The purpose of the Alliance is to be an advocate for Washington's residential gas, electric, and telecommunications customers. Washington has no privately funded consumer advocacy group dedicated to this mission. Currently, over 700, primarily low-income people throughout the state of Washington are members of the Alliance.

As an advocate for residential telecommunications customers and of low-income households, the Alliance is intensely concerned about the prospects of an increase in rates for Verizon ratepayers. We are deeply troubled by the lack of public participation in this matter and worry that a dangerous precedent could be set for rate setting matters in the future. Our contacts with telecom customers, including helping low-income households obtain basic phone service, helping them resolve phone service problems and billing disputes, and advocating for rules and regulations that protect and enhance access to phone service gives us a perspective unique and un-represented in the current action.

Our position in this case is that we think that in the current poor economic climate of Washington and in a time with little general inflationary pressure, that a rate increase is neither appropriate nor

warranted. We are also concerned about the lack of public participation in this matter and the Commission staff's willingness to recommend a rate increase before any public comment. We think that such actions, if endorsed by the Commission, set a harmful precedent.

- There is good cause for the Alliance to intervene in this matter at this stage of proceedings because only recently, by the Commission's Notice of Pre-hearing Conference dated March 19, 2003, was the Alliance, and the public at large, informed of the rate setting implications of this access charge case.
- 9 The Alliance requests that all documents in this proceeding be served on:

John O'Rourke Attorney, Citizens' Utility Alliance 212 West Second Avenue, Suite 100 Spokane, WA 99201

10 For the foregoing reasons, SNAP requests that the Commission grant this petition for intervention.

DATED this 28th day of March 2003.

Respectfully submitted,

John O'Rourke, WSBA #25188 Citizens' Utility Alliance of Washington 212 West Second Avenue, Suite 100 Spokane, WA 99201-3501 (509) 744-3370 ext. 247