

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of)	DOCKET UE-190324
)	
PUGET SOUND ENERGY)	
)	PETITION TO INTERVENE OF
For Approval of its April 2019 Power Cost)	THE ALLIANCE OF WESTERN
Adjustment Mechanism Report.)	ENERGY CONSUMERS
_____)	

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 and independent consultant 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. A list of AWEC members is included as Attachment A. AWEC represents some of Puget Sound Energy's ("PSE" or the "Company") largest customers.

5 On April 30, 2019, PSE filed its request for approval of the Company's 2019 Power Cost Adjustment Mechanism Report. Any adjustments to PSE's power costs would substantially and directly affect the rates paid by AWEC members who purchase power 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 PSE's proposed rate increases.

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AWEC—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-170033/UG-170034, and has been a party in many prior Company rate proceedings over the past decades. AWEC’s 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 4th day of June, 2019.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

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ATTACHMENT A

MEMBERS OF ALLIANCE OF WESTERN ENERGY CONSUMERS

Airgas USA, LLC
*Air Liquide
*Air Products
AkzoNobel
Alcoa
*Ampcor Rigid Plastics
Axiall, Inc.
Basic American Foods
*Boeing
Boise Cascade, Inc.
BYU Idaho
Columbia Steel
*Darigold
Dyno Nobel, Inc.
Emerald Performance Materials
Evraz, Inc.
Freres Lumber Co.
*Georgia-Pacific
Idahoan Foods
Inland Empire Paper Co.
*Intel Corp
*International Paper
Johnson Controls, Inc.
JR Simplot
Kaiser Aluminum Trentwood Facility
Kapstone Kraft Paper
Lamb Weston
Legacy Health
*Microsoft Corporation
Nippon Dynawave Packaging Co.
Norpac Foods
North Pacific Paper Co.
*Northwest Hardwoods
NW Innovation Works
On Semiconductor
Packaging Corporation of America
Pendleton
Ponderay Newsprint
Precision Castparts
REC Solar Grade Silicon LLC

Schnitzer Steel
*Shell Oil Products US
Solvay Chemicals
Supreme Perlite Co.
Swanson Group
*Tesoro Refining and Marketing Co.
Timber Products
United States Gypsum Co.
Wah Chang
WestRock
*Weyerhaeuser NR Co.

**Denotes PSE Customers*