

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

IN THE MATTER OF THE JOINT)	DOCKET U-210542
APPLICATION OF PUGET SOUND)	
ENERGY, ONTARIO TEACHERS')	
PENSION PLAN BOARD, AND)	PETITION TO INTERVENE OF
MACQUARIE WASHINGTON CLEAN)	THE ALLIANCE OF WESTERN
INVESTMENT, L.P FOR AN ORDER)	ENERGY CONSUMERS
AUTHORIZING PROPOSED SALES OF)	
INDIRECT INTERESTS IN PUGET)	
SOUND ENERGY.)	
_____)	

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 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
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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. AWEC represents some of Puget Sound Energy's ("PSE" or the "Company") largest customers.

5 On July 8, 2021, PSE, along with Ontario Teachers' Pension Plan Board and Macquarie Washington Clean Energy Investment, L.P. ("Purchasers"), filed their application for a Commission order "authorizing the transfer of the upstream, non-controlling 31.57 percent indirect ownership interest in PSE, currently held by Canada Pension Plan Investment Board, to the Purchasers...." ("Joint Application").^{1/} AWEC's member companies have a substantial interest in the Joint Application, which could substantially and directly affect the conditions of service received, as well as the rates paid, by AWEC's members who purchase electricity and gas service 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 any change to PSE's rates and programs.

^{1/} Docket U-210542, Joint Application at 1 (July 8, 2021).

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AWEC and its predecessor organizations the Industrial Customers of Northwest Utilities and the Northwest Industrial Gas Users have extensive experience in proceedings before the Commission involving PSE and have been parties to 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.

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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.

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WHEREFORE, AWEC respectfully petitions the Commission for leave to intervene in this proceeding.

Dated this 16th day of August, 2021.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

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