

1
2
3 BEFORE THE WASHINGTON STATE
4 UTILITIES AND TRANSPORTATION COMMISSION

5 In the Matter of the Petition of) DOCKET UE-141368
6 PUGET SOUND ENERGY, INC.)
7 To Update Methodologies Used to Allocate) PETITION TO INTERVENE OF
8 Electric Cost of Service and For Electric Rate) NW ENERGY COALITION
9 Design Purposes)
10 _____)

11 1. The NW Energy Coalition (Coalition) hereby requests permission to intervene in
12 the above- referenced proceeding, pursuant to WAC 480-07-355.

13 The Coalition’s business address is:
14 NW Energy Coalition
15 811 1st Ave., Suite 305
Seattle, WA 98104-1711

16 2. The Coalition will be represented in this matter by Amanda W. Goodin and Todd
17 D. True, Attorneys. Ms. Goodin, Mr. True, and Ms. Powell, litigation assistant, are designated
18 for service of all documents in this matter by electronic service only, at the following addresses:

19 Amanda W. Goodin
20 Todd True
21 Eudora Powell
22 Earthjustice
23 705 Second Avenue, Suite 203
24 Seattle, WA 98104-1711
25 (206) 343-7340 | Phone
(206) 343-1526 | Fax
agoodin@earthjustice.org
ttrue@earthjustice.org
epowell@earthjustice.org

Earthjustice
705 Second Ave., Suite 203
Seattle, WA 98104-1711
(206) 343-7340

1
2 3. The Coalition is a non-profit organization under section 501(c)(3) of the Internal
3 Revenue Code. The Coalition's primary purpose is to promote an energy future that is clean,
4 reliable, affordable, and equitable. Due to its historic and ongoing work with utility companies
5 and others to achieve these goals, the Coalition possesses a unique interest in the outcome of this
6 proceeding.

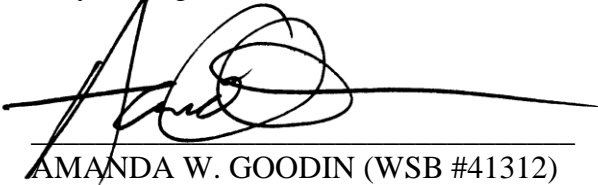
7 4. The Coalition has a special interest in this proceeding because Coalition members
8 will be affected by rate changes and cost shifting among customer classes that may result from
9 this proceeding, and rate design modifications that occur as a result of this proceeding may affect
10 customer investment in energy efficiency and impact low-income customers. The Coalition
11 intends to examine these and other issues in this proceeding.

12 5. The Coalition offers this process considerable expertise in the area of resource
13 planning, industry structure, and economic and policy analysis. The Coalition has participated in
14 numerous rate cases, mergers, and resource planning proceedings in Washington, Oregon, Idaho,
15 and Montana. The Coalition has participated in previous PSE rate cases.

16 6. The Coalition has no intention of unreasonably broadening the issues, burdening
17 the record or delaying the proceeding through its intervention.

18 7. For the foregoing reasons, the Coalition asks the Commission to grant its Petition
19 to Intervene in this matter.
20
21
22
23
24
25

1 Respectfully submitted this 8th day of August, 2014.

2 

3 AMANDA W. GOODIN (WSB #41312)
4 TODD D. TRUE (WSB #12864)
5 Earthjustice
6 705 Second Avenue, Suite 203
7 Seattle, WA 98104
8 (206) 343-7340 | Phone
9 (206) 343-1526 | Fax
10 agoodin@earthjustice.org
11 ttrue@earthjustice.org

12 *Attorneys for Petitioner NW Energy Coalition*