

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND)	DOCKET UG-230968
TRANSPORTATION COMMISSION)	
)	PETITION TO INTERVENE OF THE
Complainant,)	ALLIANCE OF WESTERN ENERGY
)	CONSUMERS
PUGET SOUND ENERGY,)	
)	
Respondent.)	
_____)	

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 for 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:

Tyler C. Pepple
Davison Van Cleve, P.C.
107 SE Washington St., Suite 430
Portland, OR 97214
tcp@dvclaw.com
Telephone: (503) 241-7242
Attorney for AWEC

Sommer J. Moser
Davison Van Cleve, P.C.
107 SE Washington St., Suite 430
Portland, OR 97214
sjm@dvclaw.com
Telephone: (503) 241-7242
Attorney for AWEC

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 and represents some of Puget Sound Energy’s (“PSE” or the “Company”)
largest customers.

5 AWEC’s member companies have a substantial interest in the interim rates
approved by the Commission at its December 21, 2023 Open Meeting, which increased costs
under PSE’s Schedule 111 related to cost recovery for PSE’s compliance with the Climate
Commitment Act (“CCA”). At the Open Meeting, the Commission also indicated that this
proceeding will address the design of a risk-sharing mechanism applicable to PSE’s CCA
compliance. Given the potential legal, policy and economic implications of such a mechanism,
the issues addressed in this proceeding could substantially and directly affect AWEC members
who take natural gas and electric service from PSE. Accordingly, AWEC requests leave to
intervene in this proceeding to represent its members who would be affected.

6 AWEC has extensive experience in proceedings before the Commission involving
PSE. AWEC participated in the Company’s last general rate case, UE-220066/UG-220067, and
has been a party in many prior Company rate proceedings over the past decades, either under its
own name or through its predecessor organizations the Industrial Customers of Northwest
Utilities and the Northwest Industrial Gas Users. 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 may be affected by any Commission determination made in connection 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 8th day of January, 2024.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Sommer J. Moser

Sommer J. Moser, OR State Bar #105260

107 SE Washington St., Suite 430

Portland, OR 97214

Telephone: (503) 241-7242

Facsimile: (503) 241-8160

sjm@dvclaw.com

Attorney for the

Alliance of Western Energy Consumers