

**BEFORE THE**  
**WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Investigation of	)	DOCKET UE-190882
	)	
AVISTA CORPORATION d/b/a	)	
AVISTA UTILITIES, PUGET SOUND	)	PETITION TO INTERVENE OF
ENERGY, and PACIFIC POWER &	)	THE ALLIANCE OF WESTERN
LIGHT COMPANY	)	ENERGY CONSUMERS
	)	
Regarding Prudency of Outage and	)	
Replacement Power Costs.	)	
_____	)	

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 3<sup>rd</sup> 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  
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 the largest customers of Avista Corporation, Puget Sound Energy, and Pacific Power & Light Company (collectively, the “Companies”).

5 On October 24, 2019, the Commission issued Order 01 in this proceeding, which required Commission Staff to initiate an investigation to evaluate the prudence of the decisions made and actions taken by the Companies with respect to the 2018 outage at the Colstrip generating station, as well as the costs incurred to acquire replacement power. Any prudence determinations the Commission makes in this proceeding could substantially and directly affect those of AWEC’s members who purchase electricity and natural gas services from the Companies. 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 the Companies’ rates and programs.

6 AWEC – through its own participation and that of its predecessor organization, the Industrial Customers of Northwest Utilities – has extensive experience in proceedings before the Commission involving the Companies. 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 25th day of October, 2019.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

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Of Attorneys for the

Alliance of Western Energy Consumers

## ATTACHMENT A

### MEMBERS OF ALLIANCE OF WESTERN ENERGY CONSUMERS

Air Gas USA, LLC  
#Air Liquide  
#Air Products  
AkzoNobel  
Alcoa  
#Amcor 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 Avista Customers*

*#Denotes PSE Customers*

*●Denotes Pacific Power Customers*