

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

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PACIFIC POWER & LIGHT
COMPANY,

Respondent.

DOCKET UE-161204

PETITION TO INTERVENE
OF THE ENERGY PROJECT

1 Pursuant to WAC 480-07-355 (1), The Energy Project hereby petitions the Washington
Utilities and Transportation Commission (Commission or UTC) for leave to intervene in the
above-captioned docket as an intervenor. The Energy Project requests intervention with full
party status as described in WAC 480-07-340.

2 The business address of The Energy Project is:

Shawn Collins
The Energy Project
3406 Redwood Avenue
Bellingham, WA 98225
Phone: (360) 734-5121 Ext. 334;
Email: shawn_collins@oppco.org

3 The Energy Project will be represented in this proceeding by Simon J. ffitch. All
documents relating to this proceeding should be served as follows: (1) to Shawn Collins and The
Energy Project in electronic format only at the above email address; (2) to Simon J. ffitch in
electronic format only at:

Simon J. ffitch
Attorney at Law
321 High School Rd. NE, Suite D3, Box No. 383
Bainbridge Island, WA 98110
Phone: (206) 669-8197
E-mail: simon@ffitchlaw.com

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ENERGY PROJECT
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Simon J. ffitch
Attorney at Law
321 High School Rd. NE,
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4 The Energy Project works with Community Action Agencies that provide rate assistance
and energy efficiency programs for Pacific Power & Light Company's (Pacific Power) low-
income electric customers. The Energy Project also works generally with utilities and other
stakeholders to develop and expand rate assistance and energy efficiency programs for low-
income customers in Washington. The Energy Project is a frequent party in general rate cases
and other significant dockets before the UTC involving Washington investor-owned utilities
when energy affordability, energy efficiency, and customer service policies are at issue. The
Energy Project has an interest in the permanent disconnection and cost-shifting issues raised in
Pacific Power's filing and the potential impact on low-income customers and programs.

5 The Energy Project has a direct and substantial interest in Pacific Power's tariff filing in
this docket and no other party will adequately represent those interests. The Energy Project will
be the only party to focus solely on the interests of low-income customers in this proceeding.
The Energy Project's intervention will not unreasonably broaden the issues, burden the record, or
delay the proceeding. Accordingly, it is in the public interest to allow The Energy Project to
intervene in this docket.

6 For the foregoing reasons, The Energy Project respectfully petitions the Commission for
leave to intervene in this proceeding.

7 Dated this 14th day of December, 2016.

Simon J. ffitc
Attorney at Law
For The Energy Project

