

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Petition of)	DOCKET UE-200857
)	DOCKET UG-200858
Avista Corporation, d/b/a Avista Utilities)	
)	PETITION TO INTERVENE OF
For an Order for Approval of Depreciation)	THE ALLIANCE OF WESTERN
and Amortization Rates for Investment in)	ENERGY CONSUMERS
Software.)	
_____)	

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 dockets 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:

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Paralegal for DVC

15 The administrative rules at issue are WAC § 480-07-340, -355.

16 AWEC is an incorporated, non-profit association of large energy consumers in the Pacific Northwest, including some of Avista Corporation's ("Avista" or the "Company") largest customers.

17 On October 9, 2020, Avista petitioned the Commission for an order authorizing the Company to "use an amortization period for its software licenses and its capitalized software integration costs that aligns with the life of the underlying contract and expected extensions for Information Technology services." Avista states that its request will not impact customers' rates at this time, but that the impact of its proposed amortization would be included in a future general rate case. The deferral of such costs for later ratemaking treatment would substantially and directly affect those of AWEC's members who purchase electricity and natural gas services from Avista. AWEC therefore requests leave to intervene in Dockets UE-200857 and UG-200858 to represent and take positions on behalf of its members who are affected by Avista's proposed deferral.

18 AWEC – on its own and through its predecessor organizations the Industrial Customers of Northwest Utilities and the Northwest Industrial Gas Users – has extensive experience in proceedings before the Commission involving Avista. AWEC participated in the Company's last general rate case, UE-190334/UG-190335, and has been a party in many prior Company rate proceedings over the past decades. AWEC's intervention in this proceeding will

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assist the Commission in resolving issues and will not unreasonably broaden the issues, burden the record, or delay this proceeding.

19 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.

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

Dated this 28th day of October, 2020.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

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