

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

In the Matter of ) DOCKET UE-230673  
)  
PACIFICORP d/b/a PACIFIC POWER & )  
LIGHT COMPANY, )  
) PETITION TO INTERVENE OF  
) THE ALLIANCE OF WESTERN  
Petition for an Order Approving Deferral of ) ENERGY CONSUMERS  
Costs Related to Insurance 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 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 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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Of Attorneys for AWEC

3                   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

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

5                   AWEC is an incorporated, non-profit association of large energy consumers in the  
Pacific Northwest. AWEC represents some of PacifiCorp d/b/a Pacific Power's ("PacifiCorp" or  
"Company") largest customers.

6                   On August 21, 2023, PacifiCorp filed its petition for an accounting order  
authorizing the Company to defer for later ratemaking treatment the costs associated with  
increased insurance premiums. If approved, the Company's petition would substantially and  
directly affect those of AWEC's members who purchase power from PacifiCorp. AWEC  
therefore requests leave to intervene in this docket to represent and take positions on behalf of its  
members who are affected by the Company's proposed rate increases.

7                   AWEC's attorneys and consultants have extensive experience in proceedings  
before the Commission involving PacifiCorp. They have represented AWEC or its members in  
many prior Company rate proceedings over the past decades, including its Power Cost Only Rate  
Case, UE-210402, its Limited Issue Rate Filing, UE-210532, and its current General Rate Case,  
UE-230172. 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.

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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.

9

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

Dated this 15th day of September, 2023.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

*/s/ Sommer J. Moser*

Tyler C. Pepple, WA State Bar No. 50475

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