

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION)	DOCKET UE-230172
)	
Complainant,)	PETITION TO INTERVENE OF
)	THE ALLIANCE OF WESTERN
v.)	ENERGY CONSUMERS
)	
PACIFICORP d/b/a PACIFIC POWER & LIGHT COMPANY,)	
)	
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 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 and independent consultants at the following addresses:

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6 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

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

8 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.

9 On March 17, 2023, the Company filed its proposed Two-Year Rate Plan, with
new base rates effective March 1, 2024, for Rate Year 1 and March 1, 2025, for Rate Year 2.
For Rate Year 1, the Company proposes a rate increase of \$28.6 million, or 6.6%. For Rate Year
2, the Company proposes a rate increase of \$27.9 million, or 6.5%. The Company's proposed
rate changes would substantially and directly affect those of AWEC's members who purchase
electricity 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.

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10 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 last General Rate Case, UE 191024. 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.

11 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.

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

Dated this 4th day of April, 2023.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Sommer J. Moser

Tyler C. Pepple, WA State Bar No. 50475

Sommer J. Moser, OR State Bar No. 105260

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