## **BEFORE THE**

## WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of	) DOCKET UE-230482
	)
PACIFICORP d/b/a PACIFIC POWER &	)
LIGHT COMPANY,	) PETITION TO INTERVENE OF
	) THE ALLIANCE OF WESTERN
2022 Power Cost Adjustment Mechanism	) ENERGY CONSUMERS
Annual Report.	)

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

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 consultant at the following addresses:

Tyler C. Pepple Davison Van Cleve, P.C. 1750 S Harbor Way, Suite 450 Portland, OR 97201 E-Mail: tcp@dvclaw.com Telephone: (503) 241-7242 Of Attorneys for AWEC Sommer J. Moser Davison Van Cleve, P.C. 1750 S Harbor Way, Suite 450 Portland, OR 97201 E-Mail: sjm@dvclaw.com Telephone: (503) 241-7242 Of Attorneys for AWEC

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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

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

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.

On June 15, 2023, PacifiCorp filed its 2022 Power Cost Adjustment Mechanism ("PCAM"), the purpose of which is to allow the Company to track unexpected variations in power costs in a PCAM deferral account. How such costs are calculated and passed on to customers will 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 rates and programs.

AWEC's attorneys and consultants have extensive experience in proceedings before the Commission involving PacifiCorp. They have represented AWEC or its members in PAGE 2 – PETITION TO INTERVENE OF AWEC

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many prior Company rate proceedings over the past decades, including its current General Rate Case, Docket UE-230172, its Power Cost Only Rate Case, Docket UE-210402, its Limited Issue Rate Filing, Docket UE-210532, and its last General Rate Case, Docket 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.

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.

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

Dated this 27th day of June, 2023.

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Respectfully submitted,

## DAVISON VAN CLEVE, P.C.

<u>/s/Sommer J. Moser</u> Tyler C. Pepple, WA State Bar No. 50475 Sommer J. Moser, OR State Bar No. 105260 Davison Van Cleve, P.C. 1750 S Harbor Way, Suite 450 Portland, OR 97201 tcp@dvclaw.com sjm@dvclaw.com Telephone: (503) 241-7242 Of Attorneys for AWEC

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