

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

WASHINGTON UTILITIES AND	)	DOCKET UG-240884
TRANSPORTATION COMMISSION,	)	
	)	
Complainant,	)	PETITION TO INTERVENE OF
	)	THE ALLIANCE OF WESTERN
v.	)	ENERGY CONSUMERS
	)	
PUGET SOUND ENERGY,	)	
	)	
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 docket as an intervenor with full party status, as described in WAC § 480-07-340. The business address for AWEC is:

Alliance of Western Energy Consumers  
3519 NE 15<sup>th</sup> Ave, #249  
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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3                   AWEC does not request paper service, unless required by WUTC rules or law.

4                   AWEC is an incorporated, non-profit association of large energy consumers in the  
Pacific Northwest. AWEC represents some of Puget Sound Energy's ("PSE" or the "Company")  
largest customers.

5                   AWEC has a substantial interest in PSE's filing, which the Company originally  
filed on November 15, 2024, and the purpose of which is to "request cost recovery for an  
increase to the state-required Climate Commitment Act [] allowance costs through the State  
Carbon Reduction Charge [] and to also to provide an increase to the pass back of auction  
proceeds through the State Carbon Reduction Credit."<sup>1</sup> At an Open Meeting held in front of the  
Commission on December 19, 2024, the Commission allowed rates to go into effect on an  
interim basis while concluding that further investigation into PSE's Schedule 111 is necessary  
and set the matter to adjudication.<sup>2</sup>

6                   The Company's proposed tariff revision could substantially and directly affect  
AWEC members who purchase natural gas services from PSE. Accordingly, AWEC requests  
leave to intervene in this proceeding to represent its members who would be affected by any  
change to PSE's rates.

7                   AWEC has extensive experience in proceedings before the Commission involving  
PSE. AWEC participated in the Company's last general rate case ("GRC"), Dockets UE-  
240004/UG-240005, and has participated in several prior rate filings for Schedule 111  
specifically. AWEC has also been a party in many prior Company rate proceedings over the past  
decades, either under its own name or through its predecessor organizations the Industrial

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<sup>1</sup> UG-240884, Transmittal Letter at 2 (Nov. 15, 2024).

<sup>2</sup> UG-240884, Commission Order 01 at ¶ 21 (December 20, 2024).

Customers of Northwest Utilities and the Northwest Industrial Gas Users. 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.

8                   As described above, AWEC has a direct and substantial interest in this proceeding that will not be adequately represented by any other party and may be affected by any Commission determination made in connection 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 27th day of February, 2025.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Sommer J. Moser

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