BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION, ) DOCKETS UE-220066 and
Complainant, ) UG-220067

v. ) PETITION TO INTERVENE OF

PUGET SOUND ENERGY, ) THE ALLIANCE OF WESTERN
Respondent. ) ENERGY CONSUMERS

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 for AWEC is:

Alliance of Western Energy Consumers
818 SW 3rd 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 consultants at the following addresses:

Tyler C. Pepple
Davison Van Cleve, P.C.
1750 SW Harbor Way, Suite 450
Portland, OR 97201
tcp@dvclaw.com
Telephone: (503) 241-7242
Attorney for AWEC

Lance D. Kaufman
4801 W. Yale Ave.
Denver, CO 80219
lance@aegisinsight.com
Telephone: (541) 515-0380
Consultant for AWEC
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

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

4 AWEC is an incorporated, non-profit association of large energy consumers in the
Pacific Northwest. A list of AWEC members is included as Attachment A. AWEC represents
some of Puget Sound Energy’s (“PSE” or the “Company”) largest customers.

5 AWEC’s member companies have a substantial interest in PSE’s general rate
case, which the Company filed on January 31, 2022. PSE requests a three-year rate plan with
first-year rate overall rate impacts of 13.59% for electric customers and 12.98% for gas
customers. The Company’s proposed tariff revisions could substantially and directly affect
AWEC members who purchase power 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.

6 AWEC has extensive experience in proceedings before the Commission involving
PSE. AWEC participated in the Company’s last general rate case, UE-190529/UG-190530, and
has 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 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.

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.

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

Dated this 8th day of February, 2022.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple
Tyler C. Pepple, WA State Bar No. 50475
Brent L. Coleman, OR State Bar No. 206480
1750 SW Harbor Way, Suite 450
Portland, Oregon 97201
Telephone: (503) 241-7242
tcp@dvclaw.com
blc@dvclaw.com
Of Attorneys for the
Alliance of Western Energy Consumers