## **BEFORE THE PUBLIC UTILITY COMMISSION**

## **OF OREGON**

## UM 366

In the Matter of

AVISTA CORPORATION, dba AVISTA UTILITIES,

ALLIANCE OF WESTERN ENERGY CONSUMERS' PETITION TO INTERVENE

Request for a General Rate Revision.

Pursuant to ORS 756.525 and OAR 860-001-0300(2), Alliance of Western Energy

Consumers ("AWEC") hereby submits this Petition to Intervene in the above-captioned

proceeding and seeks party status. In support of this Petition to Intervene, AWEC states as

follows:

1. The name and address of AWEC as a party of record in this proceeding is:

Edward A. Finklea Director of Natural Gas Alliance of Western Energy Consumers 545 Grandview Drive Ashland, OR 97520 Phone: (541) 708-6338 Facsimile: (541) 708-6339 E-Mail: efinklea@awec.solutions

Chad M. Stokes and Tommy A. Brooks from the law firm Cable Huston LLP will

represent AWEC in this proceeding. In addition to Mr. Finklea, all documents related to this proceeding should be served on AWEC's attorneys at the following address:

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2. AWEC is a non-profit association with a membership consisting of more than 50 end users of natural gas with major facilities in the States of Oregon, Washington, and Idaho. AWEC members include diverse industrial and commercial interests, including those related to universities, food processing, pulp and paper, wood products, electric generation, aluminum, steel, chemicals, electronics, aerospace, and healthcare providers. The association provides an informational service to its members and participates in various regulatory matters that affect member interests. AWEC member companies purchase sales and transportation services from Oregon local distribution companies including Avista Corporation d/b/a Avista Utilities ("Avista").

3. On March 15, 2019, Avista filed an Application to increase its natural gas rates for Oregon customers. Avista has requested a revenue requirement increase of \$6.677 million. Because AWEC member companies purchase sales and transportation services from Avista, AWEC has a direct and substantial interest in Avista's application and, therefore, in this proceeding.

4. AWEC's participation in this proceeding will assist the Commission in resolving the issues, and will not unreasonably broaden the issues, unduly burden the record, or delay the proceeding. Specifically, AWEC has internal and external expertise that will inform the

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Commission regarding revenue requirement, rate spread, and rate design. AWEC can also help inform the Commission regarding issues raised by other parties.

WHEREFORE, AWEC respectfully requests leave to intervene and requests all the rights of a party in this proceeding.

Dated this 19<sup>th</sup> day of March 2019.

Respectfully submitted,

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Chad M. Stokes, OSB No. 004007 Tommy A. Brooks, OSB No. 076071 Cable Huston LLP 1001 SW Fifth Ave., Suite 2000 Portland, OR 97204-1136 Telephone: (503) 224-3092 Facsimile: (503) 224-3176 E-Mail: <u>cstokes@cablehuston.com</u> <u>tbrooks@cablehuston.com</u>

Of Attorneys for Alliance of Western Energy Consumers