



**GREEN ENERGY
INSTITUTE**
Lewis & Clark Law School

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January 15, 2025

Via Electronic Filing to PUC.FilingCenter@puc.oregon.gov

Public Utility Commission of Oregon
Attn: Filing Center
201 High St. SE, Suite 100
Salem, OR 97301

Re: In the Matter of AVISTA UTILITIES, a division of AVISTA CORPORATION Request for General Rate Revision, Docket No. UG 519, Climate Solutions and Green Energy Institute's Petition to Intervene

Dear Filing Center:

Enclosed for filing in Docket UG 519 is the Petition to Intervene in the above-captioned proceeding for Climate Solutions and the Green Energy Institute at Lewis & Clark Law School.

If you have questions or need any additional information, please do not hesitate to contact me.

Sincerely,

/s/ Alex Houston

Alex Houston
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**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UG 519

In the Matter of

AVISTA UTILITIES,
a division of AVISTA CORPORATION

Request for General Rate Revision

CLIMATE SOLUTIONS AND GREEN
ENERGY INSTITUTE’S PETITION TO
INTERVENE

Pursuant to ORS § 756.525 and OAR 860-001-0300(2), Climate Solutions and the Green Energy Institute at Lewis & Clark Law School (“GEI”) (collectively, “Petitioners”), hereby respectfully submit this Petition to Intervene to the Public Utility Commission of Oregon (“OPUC” or “Commission”) to appear and participate to the full extent allowed by law in the above-referenced proceeding. In support of this petition, the Petitioners provide the following:

1. The contact information of the Petitioners are as follows

Name: Nora Apter
Company: Climate Solutions
Street Address: 1300 SE Stark St Suite 207
City, State, Zip: Portland, OR 97214
Email Address: nora.apter@climatesolutions.org
Telephone: (971) 275-6179

Name: Claire Prihoda
Company: Climate Solutions
Street Address: 1300 SE Stark St Suite 207
City, State, Zip: Portland, OR 97214
Email Address: claire.prihoda@climatesolutions.org
Telephone: (503) 548-2540

Name: Carra Sahler
Company: Green Energy Institute at Lewis & Clark Law School
Street Address: 10101 S. Terwilliger Boulevard
City, State, Zip: Portland, OR 97219
Email Address: sahler@lclark.edu
Telephone: (503) 768-6634

2. The Petitioners will be represented by attorney Alex Houston of the Green Energy Institute whose contact information for inclusion in the service list is:

Name: Alex Houston
OSB No. 214066
Company: Green Energy Institute at Lewis & Clark Law School
Street Address: 10101 S. Terwilliger Boulevard
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Please include this contact on the service list.

3. Climate Solutions is a regional non-profit working to accelerate clean energy solutions to the climate crisis. As part of this work, Climate Solutions supports a rapid and equitable transition to clean, fossil-free buildings for all. Climate Solutions has over 18,000 supporters in the Pacific Northwest, and almost 8,000 supporters in the State of Oregon.

4. GEI is a climate and energy policy institute within Lewis & Clark's Environmental, Natural Resources, and Energy Law program. GEI's mission is to develop equitable, comprehensive, effective strategies to prevent catastrophic climate change by furthering the just transition to a sustainable, carbon-free energy grid.

5. Collectively, Petitioners are environmental and community focused organizations that work across Oregon for the development and implementation of smart climate policy, including efforts directed to support marginalized groups experiencing the economic burden of natural gas prices in Avista's service territory.

6. Petitioners are concerned with a number of issues raised in Avista's request for a rate revision. Of particular interest, Petitioners are concerned with the overall impact of the proposed rate increase on Avista's low-income customers, Avista's strategy for implementation and investments into the energy efficiency programs it administers, Avista's plans to replace Aldyl-A piping in its distribution system, Avista's expenditures and tracking of time spent on political activities, advertising, promotion, and outreach, and the Company's requested Return on Equity and Rate of Return in relationship to its forecasted economic position and credit ratings. Petitioners reserve the right to raise other issues as the proceeding progresses as Petitioners have not yet determined the full extent of the specific relief to be requested. Petitioners anticipate participating to the extent necessary to advocate against disproportionate impacts to low-income and underserved ratepayers and prudent policy decisions regarding the future of Avista's distribution system.

7. Petitioners have a direct and substantial interest in this proceeding that is not adequately represented by any other party. Petitioners are committed to advancing their organization missions and representing the interests of members, supporters, and Oregonians—many of whom are gas utility ratepayers in Oregon, including in Avista's service territory. Moreover, Petitioners highlight the importance of representation for low-income customers, environmental justice communities, rural customers, and Southern Oregon ratepayers in rate case proceedings. Petitioners' ability to represent these underrepresented, critical communities and their perspectives before the Commission through intervention in this proceeding ensures such interests are fully evaluated and not left behind as rates and programs are developed.

8. Petitioners' intervention motion is timely and their participation will not unreasonably broaden the issues, burden the record, or delay the proceedings.

9. WHEREFORE, Petitioners respectfully request that the Commission enter an Order granting Petitioners' request to intervene to the full extent allowed by law, thereby allowing Petitioners to appear and participate as may be necessary to fully represent its interests in this proceeding

Dated this 15th day of January, 2025.

/s/Alex Houston _____

Alex Houston

OSB No. 214066

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