

Matanuska Electric Association, Inc.
P.O. Box 2929 Palmer, Alaska 99645
TEL (907) 745-3231; FAX (907) 761-9322

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STATE OF ALASKA

RECEIVED
By the Regulatory Commission of Alaska on Sep 15, 2023

THE REGULATORY COMMISSION OF ALASKA

Before Commissioners:

Keith Kurber II, Chairman
Robert A. Doyle
John M. Espindola
Robert M. Pickett
Janis W. Wilson

In the Matter of the Tariff Revision Designated as)	
TA544-8 Filed by CHUGACH ELECTRIC)	U-23-047
ASSOCIATION, INC.)	ORDER NO. 1
_____)	
In the Matter of the Tariff Revision Designated as)	
TA422-121 Filed by CHUGACH ELECTRIC)	U-23-048
ASSOCIATION, INC.)	ORDER NO. 1
_____)	

**PETITION TO INTERVENE OF
MATANUSKA ELECTRIC ASSOCIATION, INC.**

By Order U-23-047(1)/U-23-048(1),¹ dated August 17, 2023, the Commission opened an investigation into Chugach Election Association, Inc.’s (“Chugach”) tariff filings designated as TA544-8 for its southern service area, and TA422-121 for its northern service area, both of which were filed July 3, 2023. In its Order opening this investigation, the Commission invited interested parties to intervene. Pursuant to 3 AAC 48.110, Matanuska Electric Association, Inc. (“MEA”) files this petition to intervene in these proceedings.

The Commission opened this investigation to determine whether Chugach’s tariff filings are reasonable, and to determine the propriety of the filings since Chugach seeks an overall \$20.4

¹ Order U-23-047(1)/U-23-048(1): *Order Suspending Tariff Filings, Consolidating Dockets, Granting Requests for Interim and Refundable Rates, Establishing Interest Rate on Refunds, Requiring Filing, Approving Tariff Sheets, Inviting Participation by the Attorney General and Petitions for Intervention, Addressing Timeline for Decision, Designating Commission Panel, and Appointing Administrative Law Judge*, dated August 17, 2023.

1 million revenue increase, resulting in an 8.37% increase to base rate revenues. To ensure that the
2 interests of MEA's members are adequately protected, MEA seeks to intervene in this matter to
3 represent its members' interests, including gaining a full understanding of the impact that
4 Chugach's proposed revenue requirement, cost of service allocations, alternative rate design
5 changes, and proposed rate increases associated with Chugach's instant filings have on MEA's
6 members.
7

8 Correspondence and communications in these matters should be addressed to the
9 following person:

10 David Pease
11 In-House Counsel
12 Matanuska Electric Association, Inc.
13 P.O. Box 2929
14 Palmer, Alaska 99645

14 ANALYSIS

15 A petition to intervene is evaluated by the criteria set out in 3 AAC 48.110. MEA's
16 petition makes the required demonstration to support MEA's intervention.

17 1) The Nature Of The Petitioner's Right Under Statute To Be Made A Party To The
18 Proceedings

19 MEA is not aware of a statutory basis for it to be made a party to this docket.

20 2) The Nature And Extent Of The Property, Financial, Or Other Interests Of The
21 Petitioner

22 MEA has substantial property and financial interests which have the potential to be
23 impacted by the outcome of this proceeding. MEA is a utility connected to Chugach and the two
24 utilities are presently operating under an RCA approved power pooling agreement. Chugach
25 seeks significant increases in its total system based transmission wheeling service rates. While
26 Chugach and MEA do not pay wheeling to each other on pooled transactions, Chugach's

1 proposed increases in its wheeling rates will negatively impact MEA's ability to purchase
2 competitively priced power and move it across the Chugach system to MEA members. In
3 addition, any increases to Chugach's transmission revenue requirement will also ultimately
4 impact MEA's costs to access power from the RCA exempt Bradley Lake Hydro resource.
5

6 3) The Effect On Petitioner's Interest Of The Order Which May Be Entered In The
7 Proceedings

8 This proceeding has the potential to impact MEA's interests. As is set out in #2 above,
9 Chugach's proposed increased wheeling rate will adversely effect MEA's ability to cost
10 effectively move power into its service territory.

11 4) The Availability Of Other Means By Which The Petitioner's Interest May Be
12 Protected And The Extent To Which Petitioner's Will Be Represented By Existing
13 Parties

14 There are no other means for protecting MEA's interests in this matter. To MEA's
15 knowledge, this is the only proceeding in which the Commission will investigate Chugach's
16 proposed rate increase for wheeling. In addition, during the course of these proceedings other
17 issues may come to light that impact MEA's interests and if MEA is not admitted as a party,
18 those interests may not be properly protected. It is not clear if MEA's interests will be
19 adequately represented by any other parties to this docket, should other parties choose to
20 participate. MEA has no assurance another party will raise the same concerns as MEA. While
21 other entities may have similar concerns as MEA, it is unclear how they may be impacted or the
22 extent to which other entities will participate in these proceedings. Accordingly, there is no
23 entity other than MEA meaningfully situated to protect MEA's interests in this matter.
24

25 5) The Extent To Which Petitioner's Participation May Reasonably Be Expected To
26 Assist In The Development Of A Sound Record, Including The Issues That Petitioner
Intends To Address In The Proceeding And The Extent To Which Participation Of
The Petitioner Will Broaden The Issue Or Delay The Proceeding

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MEA's participation in this docket will not unduly broaden or delay the proceeding. As an intervener, MEA will address those issues necessary for a full evaluation of Chugach's responses to the Commission's questions. MEA's participation will raise and address issues as to which MEA's perspective will assist the Commission in developing a sound record and in reaching a reasoned decision considering all the pertinent factors.

CONCLUSION

Upon consideration of the factors listed in 3 AAC 48.110, MEA respectfully requests that its petition to intervene be granted. MEA has a substantial financial interest in these proceedings that will not be protected by any other party. MEA's petition is timely, and MEA's participation will assist the Commission in the development of a complete record upon which sound decisions can be based.

DATED September 15, 2023, at Palmer, Alaska.



David Pease
In-House Counsel
Matanuska Electric Association, Inc.
P.O. Box 2929
Palmer, Alaska 99645
Phone: (907) 761-9275
Email: david.pease@mea.coop
Alaska Bar No. 8706041

Matanuska Electric Association, Inc.
P.O. Box 2929 Palmer, Alaska 99645
TEL (907) 745-3231; FAX (907) 761-9322

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CERTIFICATE OF SERVICE

I hereby certify that on September 15, 2023, a true and correct copy of **PETITION TO INTERVENE OF MATANUSKA ELECTRIC ASSOCIATION, INC.** was distributed via e-mail to the following:

Regulatory Affairs of Public Advocacy

Jeffrey Waller
JC Croft
Deborah Stojak
900 West 5th Ave, Suite 525
Anchorage, AK 99501
Email: jeff.waller@alaska.gov
jc.croft@alaska.gov
deborah.stojak@alaska.gov

Chugach Electric Association, Inc.

Arthur Miller, Chief Executive Officer
Chugach Electric Association, Inc.
P.O. Box 196760
Anchorage, AK 99519
Email: Arthur_Miller@chugachelectric.com

Matanuska Electric Association, Inc.

David Pease, In-House Counsel
Tony Zellers, Sr. Director of Power Supply
Kimberly Henkel, Energy Supply Manager
Mariah Green, Executive Assistant
Matanuska Electric Association, Inc.
P.O. Box 2929
Palmer, AK 99645
Email: david.pease@mea.coop
tony.zellers@mea.coop
kim.henkel@mea.coop
mariah.green@mea.coop



Mariah Green
Executive Assistant