

**STATE OF ALASKA**  
**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 Revisions Designated as TA544-8 Filed by CHUGACH ELECTRIC ASSOCIATION, INC.	) ) )	<b>U-23-047</b>
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In the Matter of the Tariff Revisions Designated as TA422-121 Filed by CHUGACH ELECTRIC ASSOCIATION, INC.	) ) )	<b>U-23-048</b>
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**GOLDEN VALLEY ELECTRIC ASSOCIATION, INC.'S**  
**PETITION TO INTERVENE**

1       **I. Introduction and Overview**

2           Pursuant to 3 AAC 48.110(c) and U-23-047(1)/U-23-048(1), Golden Valley Electric  
3 Association, Inc. ("GVEA") petitions to intervene in Dockets U-23-047/U-23-048, the Regulatory  
4 Commission of Alaska's ("Commission") investigation into Chugach Electric Association, Inc.'s  
5 ("CEA") tariff revisions designated as TA544-8 and TA422-121.

6           CEA's proposed tariff changes include updates to its firm and non-firm transmission  
7 wheeling rates and attendant ancillary services. As a customer of CEA's transmission wheeling  
8 services, GVEA has a particular interest in participating in this docket and ensuring that the final  
9 rates contained in CEA's transmission and ancillary service tariffs are just, reasonable, and fair  
10 to GVEA and GVEA's members. GVEA's intervention will be conducive to the ends of justice  
11 and not unduly delay the proceeding. It requests that the Commission grant its petition.

1           **II. The Commission’s Seven Factor Test for Intervention**

2           The Commission applies seven factors to determine whether it will permit intervention,  
3 which are as follows:

- 4           (1) The nature of the petitioner’s right under the statute to be made a party to the  
5           proceeding;
- 6           (2) The nature and extent of the property, financial, or other interest of the petitioner;
- 7           (3) The effect on petitioner’s interest of the order which may be entered in the proceeding;
- 8           (4) The availability of other means by which the petitioner’s interest may be protected;
- 9           (5) The extent to which petitioner’s interest will be represented by existing parties;
- 10          (6) The extent to which petitioner’s participation may reasonably be expected to assist in  
11          the development of a sound record, including the issues the petitioner intends to address  
12          in the proceeding; and
- 13          (7) The extent to which participation of the petitioner will broaden the issues or delay the  
14          proceeding.<sup>1</sup>

15          As discussed below, GVEA meets the intervention standards of 3 AAC 48.110(b).

16           **III. GVEA Satisfies the Commission’s Intervention Standard.**

17           **(1) The Nature of the Petitioner’s Right to Intervene Under Statute.**

18           GVEA does not assert a statutory right to be made a party, and instead seeks to  
19 intervene under the Commission’s permissive authority.

20           **(2) The Nature and Extent of the Property, Financial, or Other Interest of**  
21           **the Petitioner.**

22           As the largest purchaser of economy energy on the Railbelt electric system, GVEA is  
23 one of the largest customers of CEA’s transmission wheeling service. Therefore, GVEA has a  
24 significant financial interest at stake in this proceeding to ensure its members pay just and

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<sup>1</sup> 3 AAC 48.110(b)(1)-(7).

1 reasonable rates for transmission service and that adequate support and justification exists for  
2 CEA's proposed changes to its transmission service rates.

3 GVEA currently takes service under three of CEA's transmission rate schedules—Rate  
4 Schedules T-1, T-2, and T-8. CEA is proposing high rate increases to these rate schedules  
5 through its filing, without any foundational basis or support for doing so. For Rate Schedule T-  
6 1, CEA proposes a 25 percent increase, from \$0.00052 up to \$0.00065/kW per hour; for Rate  
7 Schedule T-2, CEA proposes an 82 percent increase, from \$0.00088 up to \$0.00160/kW per  
8 hour; and for Rate Schedule T-8, CEA proposes a 27 percent increase, from \$0.01116 to  
9 \$0.01412/kW per hour. Based on historical usage levels, GVEA estimates that CEA's proposed  
10 rate increase across all schedules could increase GVEA's annual costs by over \$700,000.  
11 GVEA's members already pay the highest rate for cost of power on the Railbelt.<sup>2</sup> This rate is a  
12 direct pass-through of the costs GVEA incurs to generate its own power, or to purchase power  
13 from other entities. Therefore, any change to CEA's transmission rates will have a direct impact  
14 on GVEA's cost of providing electric service to its members. As such, GVEA has an interest in  
15 ensuring that any rate increase that it will pass along to its members is just and reasonable.

16 (3) **The Effect on Petitioner's Interest of the Order Which May Be Entered**  
17 **in the Proceeding.**

18 The Commission's order in this case would impact GVEA's interests as any increase in  
19 the cost of transmission wheeling services would directly increase the cost of providing retail  
20 service to its members. As explained above, these costs will be passed along to those members  
21 through GVEA's cost of power adjustment mechanism.

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<sup>2</sup> This rate is referred to interchangeably as the Fuel and Purchased Power Rate, or the Cost of Power Adjustment.

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(4) **The Availability of Other Means by Which the Petitioner’s Interest May Be Protected.**

There are no other reasonable means available by which GVEA’s interests will be adequately protected except through GVEA’s participation in this docket. GVEA relies on CEA to provide reasonably priced and reliable transmission service for GVEA’s members. Should the Commission approve a rate increase, GVEA will have no other opportunity to contest the rate increase or otherwise petition for adjustment of the rate at which it purchases transmission wheeling service from CEA.

(5) **Extent to Which Petitioner’s Interests Will Be Represented by Existing Parties.**

Other parties to the docket, including the Attorney General’s Regulatory Affairs and Public Advocacy section or other electric utilities, cannot reasonably be expected to adequately represent GVEA’s interests in this proceeding. As a utility serving a unique set of members, GVEA has a particular interest in ensuring that its members receive a just and reasonable rate. GVEA will be focused on issues that directly impact its members and is in the best position to advocate on their behalf.

(6) **The Extent to Which the Petitioner’s Participation May Reasonably Be Expected to Assist in the Development of a Sound Record, Including the Issues that Petitioner Intends to Address in the Proceeding.**

GVEA’s participation will aid the Commission in the development of a sound record. GVEA can assist the Commission in identifying the impact of the proposed tariff revisions on CEA’s transmission wheeling service customers and other customers and contribute to a broader discussion on the allocation methodology used by CEA in support of its proposed transmission service rates. GVEA has significant experience engaging with CEA’s transmission tariff provisions.

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(7) **The Extent to Which Participation of the Petitioner Will Broaden the Issue or Delay the Proceeding.**

GVEA intends to address issues that are within the scope of the proceeding, specifically the impact of the tariff modifications on GVEA and its members and CEA's allocation methodology. Such assertions will not broaden the issues or delay the proceeding.

For these reasons, GVEA requests that the Commission grant it party status in this case.

Dated this 18<sup>th</sup> day of September 2023.

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## **CERTIFICATE OF SERVICE**

I hereby certify that on September 18, 2023, a true and correct copy of **Golden Valley Electric Association, Inc.'s Petition to Intervene** was served via e-mail on the following:

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