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BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND	)	
TRANSPORTATION COMMISSION,	)	
	)	DOCKET NO. UE - 010038
Complainant,	)	
	)	PETITION TO INTERVENE OF
vs.	)	KING COUNTY
	)	
PUGET SOUND ENERGY, INC.,	)	
	)	
Defendant,	)	
	)	
	)	

---

King County, Washington (“County”), by and through Pam Bissonnette, Director of the King County Department of Natural Resources, petitions the Washington Utilities and Transportation Commission (“WUTC” or “Commission”) for leave to intervene in the above-referenced docket pursuant to WAC § 480-09-430.

**1. Name and Address of Petitioner.**

King County  
E550 King County Courthouse  
516 Third Avenue  
Seattle, WA 98104  
  
Phone: (206) 296-9015

**2. Name and Address of Attorneys representing Petitioners.** The Petitioner will be represented by:

**Norm Maleng**, Prosecuting Attorney  
CIVIL DIVISION  
Natural Resources Section  
900 King County Administration Building  
500 Fourth Avenue  
Seattle, Washington 98104  
(206) 296-0430 Fax (206) 296-0415

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William Blakney, Senior Deputy Prosecuting Attorney  
WSB No. 16734

Donald C. Woodworth, Senior Deputy Prosecuting Attorney  
WSB No. 4627

Office of the King County Prosecuting Attorney  
900 King County Administration Building  
500 Fourth Avenue  
Seattle, Washington 98104

Phone: (206) 296-0430  
Fax: (206) 296-0415

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3. **Petitioner.** King County is a home rule charter county under Article 11 § 4 (amendment 21) and was established pursuant to Title 36 of the Revised Code of Washington. Pam Bissonnette is authorized to sign this petition by virtue of her position as director of the King County Department of Natural Resources, a director reporting to Ron Sims, King County Executive.

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4. **Petitioner has participated in the following UTC cases in the last two years:**

To the best our knowledge, King County has not actively participated in UTC cases in the last two years. King County was an intervenor in *In the Matter of the Application of Puget Sound Power & Light Co. and Washington Natural Gas Co. for an Order Authorizing Merger*, UE-960195.

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5. **Petitioner’s interest.** King County has the following substantial interests in this proceeding:

- a. King County is a local county government. Its interest is to protect King County taxpayers and sewage customers.
- b. King County is currently a customer of Puget Sound Energy, Inc. under Schedule 48.

**Norm Maleng**, Prosecuting Attorney  
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- 1 c. King County purchases power from Puget Sound Energy, Inc. pursuant to Schedule 48, and  
2 would be eligible to do so under proposed Schedule 448, for use in its South Wastewater  
3 Treatment Plant in Renton, Washington.
- 4 d. King County has been engaged in discussions with Puget Sound Energy, Inc. to determine  
5 the effect of proposed Schedules 448 and 449 on its electrical service.
- 6 e. King County does not intend to broaden the issues in this proceeding, and its participation as  
7 an intervenor will not prejudice any party. King County desires to participate in this  
8 proceeding to:
- 9 • represent and protect the interests of its residents, taxpayers and sewer customers,  
10 and
  - 11 • represent its own commercial interests in receiving safe, adequate, reliable and  
12 efficient service at just, fair, reasonable and sufficient prices.

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14 **6. Petitioner will raise the following issues:**

15 Will the proposed Schedule 448 provide King County and the public with safe, adequate, reliable  
16 and efficient electrical power at rates that are fair, just, reasonable and sufficient?  
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18 **7. Petitioner's participation.** Petitioner will submit written testimony and exhibits, call witnesses  
19 to testify, cross-examine witnesses called by other parties and file written arguments and motions as  
20 is determined necessary during the course of the proceedings.  
21

22 **8. I submit this Petition to Intervene and request authorization to participate in this proceeding.**  
**Norm Maleng**, Prosecuting Attorney  
CIVIL DIVISION  
Natural Resources Section  
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\_\_\_\_\_  
Pam Bissonnette  
Director, King County Department  
of Natural Resources

\_\_\_\_\_  
Date

\_\_\_\_\_  
STATE OF \_\_\_\_\_ )  
\_\_\_\_\_) SS.  
\_\_\_\_\_ COUNTY )

I, Pam Bissonnette, affirm that this petition is true and complete to the best of my knowledge and belief.

\_\_\_\_\_  
Pam Bissonnette  
Director, King County Department of Natural Resources

**Norm Maleng**, Prosecuting Attorney  
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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all parties of record in this proceeding, by United States mail.

Melinda Davison  
Davison Van Cleve  
1300 SW Fifth Ave. Ste. 2915  
Portland, OR 97201

Steve Secrist  
Puget Sound Energy (E012)  
Rates & Regulations  
PO Box 97034 (MS:OBC-03W)  
Bellevue, WA 98009-9734

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5 [ ] By Legal Messenger  
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DATED at Seattle, Washington, this 27th day of March, 2001.  
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Athena Stahl Legal Secretary for  
Donald C. Woodworth