

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

DOCKETS UE-220066 and UG-220067

King County's Petition to Intervene

1. Pursuant to WAC 480-07-355, King County ("County") hereby petitions the Washington Utilities and Transportation Commission ("WUTC" or "Commission") for leave to intervene in the above-referenced dockets as an intervenor with full party status as described in WAC 480-07-340. The County's business address is:

King County Prosecuting Attorney's Office
1191 2nd Avenue, Suite 1700
Seattle, WA 98101

2. The County will be represented in this proceeding by (i) King County Prosecuting Attorneys Verna Bromley and Raul Martinez and (ii) Benjamin A. Mayer and Kari L. Vander Stoep from K&L Gates LLP. All documents relating to this proceeding should be served electronically, unless paper service is required by WUTC rules or law, on the County's attorneys at the following addresses:

Verna Bromley,
Senior Deputy Prosecuting Attorney
King County Prosecuting Attorney's Office
1191 2nd Avenue, Suite 1700
Seattle, WA 98101
Verna.Bromley@kingcounty.gov
Tel.: 206.477.1097

Raul Martinez,
Senior Deputy Prosecuting Attorney
King County Prosecuting Attorney's Office
1191 2nd Avenue, Suite 1700
Seattle, WA 98101
Raul.Martinez@kingcounty.gov
Tel.: 206.447.1876

King County's Petition to Intervene

Benjamin A. Mayer
K&L Gates LLP
925 Fourth Avenue, Suite 2900
Seattle, WA 98104
ben.mayer@klgates.com
Tel.: 206.370.8074

Kari L. Vander Stoep
K&L Gates LLP
925 Fourth Avenue, Suite 2900
Seattle, WA 98104
kari.vanderstoep@klgates.com
Tel.: 206.370.7804

If permitted by the presiding officer, the County also requests that electronic service be provided to K&L Gates paralegal Dirk Middents at dirk.middents@klgates.com.

3. The administrative rules at issue are WAC 480-07-340 and WAC 480-07-355.
4. The County is a municipal corporation in the state of Washington and is the largest purchaser of clean energy from Puget Sound Energy's ("PSE" or "Company") Green Direct program.
5. As the Company's largest Green Direct customer, the County has a direct and substantial interest in this proceeding that will not be adequately represented by any other party and that may be affected by Commission action in this proceeding. The Company's filing includes a proposal for allocating costs and benefits under the Green Direct program, including a method for calculating the energy credit for Green Direct customers, and thus could impact the County's costs as the largest buyer of Green Direct energy. If approved, the proposed calculation method will also make it difficult for the County to accurately forecast and budget for costs.
6. The County's intervention will not broaden the issues in or scope of this proceeding. The County seeks intervention solely to participate on the Green Direct issues identified by the Company in its filing and requests that the Commission limit its intervention and participation to Green Direct issues.
7. In sum, there is no other party that can represent and protect the County's significant interests and the County's intervention is in the public interest. The County thus

King County's Petition to Intervene

requests intervention in this proceeding.

8. Finally, given the limited nature of the Green Direct issues in this proceeding, the County requests expedited resolution of those issues via the ongoing settlement discussions pursuant the Settlement Agreement and Order 05 in Docket UE-200980 and/or an early settlement conference in this proceeding.

Dated this 22nd day of February 2022

K&L GATES LLP

By: s/ Benjamin A. Mayer
Benjamin A. Mayer, WSBA No. 45700
Kari L. Vander Stoep, WSBA No. 35923
K&L Gates LLP
On Behalf of King County
925 Fourth Avenue, Suite 2900
Seattle, WA 98104-1158
ben.mayer@klgates.com
kari.vanderstoep@klgates.com