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GRANT E. TANNER

May 26, 1992

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92 MAY 28 17:42
STATE OF WASH
UTILITY COMMISSION

Mr. Paul Curl, Secretary
Washington Utilities and Transportation Commission
Chandler Plaza Building
1300 S Evergreen Park Drive SW
Olympia WA 98504

Re: UE-920499
Our File No. 29446\11

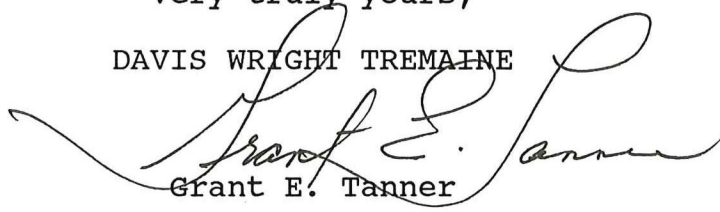
Dear Mr. Curl:

Enclosed for filing is the Petition for Leave to Intervene on behalf of WICFUR (Washington Industrial Customers for Fair Utility Rates). Also enclosed are 19 copies.

Thank you for your assistance.

Very truly yours,

DAVIS WRIGHT TREMAINE



Grant E. Tanner

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Enclosures
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1 BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

2	WASHINGTON UTILITIES AND)	
3	TRANSPORTATION COMMISSION,)	
4	Complainant,)	Docket No: UE-920499
5	vs.)	
6	PUGET SOUND POWER AND LIGHT)	PETITION FOR LEAVE
7	COMPANY,)	TO INTERVENE
8	Respondent.)	

9 I.

10 The Washington Industrial Committee for Fair Utility
11 Rates (WICFUR) seeks to intervene in this proceeding pursuant to
12 WAC 480-09-430.

13 II.

14 WICFUR is an association of large industrial consumers of
15 electricity in the State of Washington, including customers of
16 Respondent.

17 III.

18 WICFUR's business address is:

19 WICFUR
 20 c/o Mr. Tom Waite
 21 The Boeing Company
 22 P.O. Box 3707, M/S 6Y-70
 23 Seattle, Washington 98124-2207

22 IV.

23 WICFUR's attorneys are:

24 Grant E. Tanner
 25 Davis Wright Tremaine
 26 2300 First Interstate Tower
 1300 SW Fifth Avenue
 Portland, Oregon 97201

1 V.

2 WICFUR is interested in this proceeding. WICFUR actively
3 participated in the Rate Design Collaborative Group (RDCG), the
4 product of which led to this filing. WICFUR has also participated
5 in each of the dockets opened by the Commissions and in informal
6 discussions and negotiations with Respondent and other interested
7 parties pertaining to various aspects of regulatory reform,
8 including least cost planning, establishment of a PRAM, and the
9 Commission's Notice of Inquiry Relating to the Elimination of
10 Regulatory Barriers to Least Cost Planning.

11 Respondent's rate design filing brings into focus various
12 issues that WICFUR has addressed in rate making proceedings before
13 the Commission. These issues include the proper allocation to
14 customers of Respondent's revenue requirements, the appropriate use
15 of marginal costs in rate making and rate design for industrial
16 customers. WICFUR reserves the right to address these and
17 additional issues, as well, as they may arise over the course of
18 these proceedings.

19 In addition, Respondent's filing requests that the
20 Commission permit Respondent to implement as soon as possible
21 various optional rate designs for industrial customers. While
22 WICFUR agrees that these optional rate designs can and should be
23 implemented prior to the conclusion of Respondent's 1993 general
24 rate case, WICFUR also submits that the details of these rate
25 designs warrant further examination by the Commission. WICFUR
26 believes that the structure of Respondent's proposed industrial

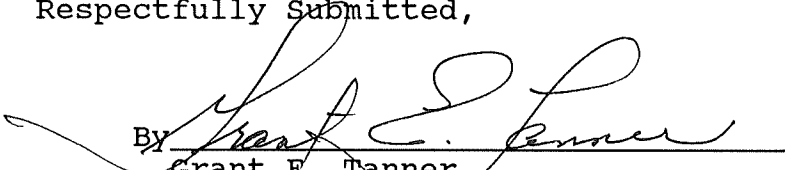
1 rate designs can be improved in a manner that will enhance their
2 acceptability to industrial customers.

3 VI.

4 WICFUR's intervention will not unreasonably broaden the
5 issues, burden the record or unreasonably delay the proceedings.

6 DATED this 26th day of May, 1992.

7 Respectfully Submitted,

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9 
10 BY Grant E. Tanner
11 Of Counsel for Washington
12 Industrial Committee for Fair
13 Utility Rates
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19 F:\2\29446\11\petition.int

CERTIFICATE OF SERVICE

I hereby certify that on the 26 day of May, 1992, I served copies of the PETITION FOR LEAVE TO INTERVENE on behalf of WICFUR, Docket No. UE-920499, by depositing a copy thereof postage prepaid in the United States First Class Mail to the following parties:

Mr. Paul Curl, Secretary
Washington Utilities and Transportation Commission
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Olympia WA 98504

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Olympia WA 98504-2489

Dated this 26th day of May, 1992.

By: 

Grant E. Tanner
Of Attorneys for the
Washington Industrial
Committee for Fair Utility
Rates

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