

BEFORE THE WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION

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STATE OF WASH.
UTIL. AND TRANS.
COMMISSION

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION

Complainant

v.

PUGET SOUND POWER &
LIGHT COMPANY

Respondent

DOCKET NO. UE-920499

PETITION FOR
INTERVENTION

Pursuant to WAC 480-09-430, Bellingham Cold Storage Company, Trident Seafoods, Versacold, Americold, National Frozen Foods, and Bellingham Frozen Foods ("Intervenors") hereby petition to intervene in the above-captioned proceeding. In support of their petition, Intervenors state as follows:

1. The following persons should be included on the official service list in this proceeding, and all communications concerning this petition should be addressed to:

Carol S. Arnold
Preston Thorgrimson Shidler Gates & Ellis
5400 Columbia Center
701 Fifth Avenue
Seattle, Washington 98104

2. Intervenors are in the business of providing frozen food processing and cold storage services in Whatcom and Skagit County, Washington. Intervenors are customers of Puget Sound Power & Light Company ("Puget") and take electric service under Puget's Rate Schedules 46, 31, 24, or 49.

3. Frozen food processing and cold storage facilities use substantial quantities of electricity, the cost of electricity is in most cases Intervenors' largest single cost of doing business.

4. Intervenors compete with frozen food processing and cold storage operations in eastern Washington and Seattle that enjoy substantially lower electric costs than do operators in Puget's service territory. As a result of high electric costs and other competitive factors, eight out of fifteen cold storage operations in this area have moved in the past ten years to eastern Washington or have gone out of business. The number of people employed in the frozen food processing and cold storage industries has dropped by half, from approximately 4500 people to approximately 2400 people.

5. Intervenors have not yet had the opportunity to fully review the prefiled testimony and exhibits and have not yet formulated their position with regard to the matters in controversy. However, Intervenors wish to appear and participate with respect to the Commission's determination of Puget's base and resource costs for each class.

5. Intervenors have a substantial interest in the present proceeding, they do not desire to broaden the issues of the proceeding, and they desire to appear and participate.

WHEREFORE, Intervenors request leave to intervene in this proceeding.

DATED this 19th day of June, 1992.

Respectfully submitted,

PRESTON THORGRIMSON SHIDLER
GATES & ELLIS

By 
Carol S. Arnold

Attorneys for Bellingham Cold
Storage Company, Trident Seafoods,
Versacold, Americold, National
Frozen Foods, and Bellingham Frozen
Foods

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing Petition to Intervene on June 19, 1992, by mailing a copy thereof, postage prepaid, first class mail at Seattle, Washington, to all parties listed on the official service list in Docket No. UE-920499 as follows:

Washington Utilities and Transportation Commission
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Seattle, WA 98164

DATED this 19th day of June, 1992.

Carol S. Arnold
Carol S. Arnold