February 6, 2017

**VIA ELECTRONIC SUBMISSION**

**& FEDERAL EXPRESS**

Mr. Steven King

Executive Director & Secretary

Washington Utilities and Transportation Commission

1300 South Evergreen Park Drive S.W.

Olympia, WA 98504-7250

**Re: Puget Sound Energy, Docket Nos. UE-170033 & UG-170034**

Dear Mr. King:

Enclosed please find Nucor Steel Seattle, Inc.’s Petition to Intervene in the above-referenced proceeding.

An electronic copy of this filing will be provided to the Records Center and all parties listed on the current master service list. Please contact the undersigned if you have any questions or concerns regarding this matter.

Sincerely,

Damon E. Xenopoulos, Esq.

Shaun C. Mohler, Esq.

Stone Mattheis Xenopoulos & Brew, PC

1025 Thomas Jefferson Street, N.W.

Suite 800 West

Washington, DC 20007

Telephone: (202) 342-0800

Facsimile: (202) 342-0807

[dex@smxblaw.com](mailto:dex@smxblaw.com)

[scm@smxblaw.com](mailto:scm@smxblaw.com)

Enclosure

cc: Service List

**BEFORE THE**

# WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

|  |  |  |
| --- | --- | --- |
| **WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,**  **Complainant,**  **v.**  **PUGET SOUND ENERGY,**  **Respondent.** | **)**  **)**  **)**  **)**  **)**  **)**  **)**  **)**  **)**  **)** | **DOCKETS UE-170033 and UG-170034 (*Consolidated*)**  **PETITION TO INTERVENE OF**  **NUCOR STEEL SEATTLE, INC.** |

Pursuant to WAC § 480-07-355, Nucor Steel Seattle, Inc. (“Nucor”) hereby moves for leave to intervene in the above-referenced proceeding before the Washington Utilities and Transportation Commission (“Commission”). As required by WAC § 480-07-145(2)(d), Nucor has provided this Petition by electronic mail. In support of this Motion, Nucor states as follows:

1. On January 13, 2017, Puget Sound Energy, Inc. (“PSE”) filed revisions to its currently effective Tariff WN U-60, Tariff G, Electric Service and currently effective Tariff WN U-2, Natural Gas. The effect of these filings is to increase rates and charges for electric and natural gas service provided to customers in the state of Washington.

2. Nucor owns and operates a steel mill in Seattle, Washington, and takes natural gas transportation service from PSE. Nucor’s full name and primary place of business is:

Nucor Steel Seattle, Inc.

2424 SW Andover  
Seattle, WA 98106-1100

3. As a major transportation customer of PSE, Nucor has a direct interest in this proceeding, and the outcome may have a substantial and direct effect on Nucor. Nucor has not yet determined what, if any, positions it will take on any issues raised, nor what relief it may seek to protect its interests.

4. Nucor’s intervention in this proceeding will not broaden the issues.

5. The following persons should be included on the service list in these proceedings, and all communications concerning this matter should be addressed to:

Damon E. Xenopoulos, Esq.

Shaun C. Mohler, Esq.

Stone Mattheis Xenopoulos & Brew, PC

1025 Thomas Jefferson Street, N.W.

Suite 800 West

Washington, DC 20007

Telephone: (202) 342-0800

Facsimile: (202) 342-0807

[dex@smxblaw.com](mailto:dex@smxblaw.com)

[scm@smxblaw.com](mailto:scm@smxblaw.com)

Damon E. Xenopoulos is designated as the person to receive official service of documents on behalf of Nucor in this proceeding.

6. If the Commission should grant this Petition to Intervene, Nucor waives service of process by means of personal delivery, United States mail, and parcel delivery service pursuant to WAC 480-07-150 (5) for all paper documents that are available in complete form by electronic means, provided that such documents are delivered electronically to the email addresses (or by electronic media such as compact disk to the mailing addresses) set forth in Paragraph 5 of this Petition.

WHEREFORE, Nucor respectfully petitions the Commission for leave to participate in this proceeding with full rights as a party.

DATED this 6th day of February, 2017.

Respectfully submitted,

Damon E. Xenopoulos, Esq.

Shaun C. Mohler, Esq.

Stone Mattheis Xenopoulos & Brew, PC

1025 Thomas Jefferson Street, N.W.

Suite 800 West

Washington, DC 20007

Telephone: (202) 342-0800

Facsimile: (202) 342-0807

[dex@smxblaw.com](mailto:dex@smxblaw.com)

[scm@smxblaw.com](mailto:scm@smxblaw.com)

**Attorneys for Nucor Steel Seattle, Inc.**

**DOCKET NOS. UE-1700033 & UG-1700034**

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the attached Petition to Intervene of Nucor Steel Seattle, Inc. upon all parties of record (listed below) in this proceeding, by email and/or U.S. Mail with first class postage prepaid. Dated at Washington, D.C. this 6th day of February, 2017.

|  |  |
| --- | --- |
| Sally Brown  Assistant Attorney General WUTC PO Box 40128 Olympia, WA 98504-0128 [sbrown@utc.wa.gov](mailto:sbrown@utc.wa.gov) | Simon ffitch Office of the Attorney General 800 Fifth Avenue STE 2000 Seattle, WA 98104-3188 [simonf@atg.wa.gov](mailto:simonf@atg.wa.gov) |
| Ken Johnson Director, Rates & Regulatory Affairs Puget Sound Energy (E012) PO BOX 97034, PSE-08N Bellevue, WA 98009-9734 [ken.s.johnson@pse.com](mailto:ken.s.johnson@pse.com) | Sheree Strom Carson  Jason T. Kuzma  Donna Barnett  Perkins Coie LLP  10885 NE Fourth Street, Suite 700  Bellevue, WA 98004-5579  [scarson@perkinscoie.com](mailto:scarson@perkinscoie.com)  [jkuzma@perkinscoie.com](mailto:jkuzma@perkinscoie.com)  [dbarnett@perkinscoie.com](mailto:dbarnett@perkinscoie.com) |
| Lisa W. Gafken  Assistant Attorney General  Public Counsel Unit  Office of the Attorney General  800 Fifth Avenue, Suite 2000  Seattle, WA 98104-3188  [Lisaw4@atg.wa.gov](mailto:Lisaw4@atg.wa.gov) | Travis Ritchie Attorney SIERRA CLUB 2101 Webster Oakland, CA 94612 [travis.ritchie@sierraclub.org](mailto:travis.ritchie@sierraclub.org) |

Shaun C. Mohler, Esq.