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July 16, 1992

Mr. Paul Curl, Secretary  
Washington Utilities & Transportation Commission  
1300 S. Evergreen Park Dr. S.W.  
P.O. Box 47250  
Olympia, WA 98504-7250


Re: WUTC v. Puget Sound Power & Light Co.,  
Docket No.UE-920499

Dear Mr. Curl:

Enclosed for filing are the original and 19 copies of  
the Petition of the Building Owners & Managers Association for  
Leave to Intervene in the above-referenced proceeding.

Very truly yours,

ATER WYNNE HEWITT DODSON & SKERRITT

  
Arthur A. Butler  
Attorneys for BOMA

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RECEIVED

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BEFORE THE WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND )  
TRANSPORTATION COMMISSION, )  
 )  
Complainant, )  
 )  
v. )  
 )  
PUGET SOUND POWER AND LIGHT )  
COMPANY, )  
 )  
Respondent. )  
\_\_\_\_\_ )

DOCKET NO. UE-920499  
PETITION OF BUILDING OWNERS &  
MANAGERS ASSOCIATION FOR  
LEAVE TO INTERVENE

The Building Owners & Managers Association of Seattle and King County ("BOMA") ("Petitioner"), through its attorney, Arthur A. Butler of Ater Wynne Hewitt Dodson & Skerritt, respectfully petitions for leave to intervene in these proceedings. In support of its petition, Petitioner states the following:

1. This petition is brought under the terms and conditions of WAC 480-09-430.
2. Petitioner desires to appear and participate in the proceedings and will not by its appearance and participation broaden the issues beyond those stated in the cause.

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1           3. The name, address, and telephone numbers of Petitioner  
2 are:

3                   BOMA  
4                   825 Securities Building  
5                   1904 Third Avenue  
6                   Seattle, Washington 98101  
7                   ATTN: Ron Miller, Executive Director  
8                   Telephone: (206) 622-8924  
9                   FAX: (206) 292-8060

10           4. The name, address and telephone numbers of Petitioner's  
11 attorney are:

12                   Arthur A. Butler  
13                   Ater Wynne Hewitt Dodson & Skerritt  
14                   1201 Third Avenue, Suite 2850  
15                   Seattle, Washington 98101  
16                   Telephone: (206) 623-4711  
17                   FAX: (206) 467-8406

18           5. Petitioner's interest in this proceeding is as follows:

19 BOMA represents approximately 90 property management companies  
20 operating in the Seattle/King County area, 23 of which are  
21 customers of respondent, Puget Sound Power & Light Company. As  
22 the representative of many of Respondent's commercial customers,  
23 Petitioner plainly has a substantial interest in any proceeding  
24 that might affect the rates that those customers must pay.  
25 Petitioner is particularly interested in policies that will  
26 determine how Respondent's costs of service are calculated and  
how revenue requirements are allocated to the various customer  
classes, including how the costs of conservation are classified  
and allocated. Petitioner is also interested in the policies  
that will determine the design of rates and in the various  
optional rate designs for commercial and other customers proposed  
by the company.

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1           6. Good cause exists for the Commission to grant this  
2 petition pursuant to WAC 480-09-430(b). Over the course of the  
3 last half of 1991 and the first half of 1992, BOMA learned about  
4 Puget's intention of making a filing that would involve a broad  
5 review of cost allocation, rate spread, and rate design issues.  
6 In fact, BOMA actively participated in Puget's Rate Design  
7 Collaborative Group. While BOMA was generally aware of the Puget  
8 proceedings, it was confused as to which issues would be  
9 addressed in which specific cause.

10           7. In June 1992, it became apparent to BOMA that it must  
11 intervene in the Puget proceedings in order to protect its  
12 members' interests. Historically, BOMA has not been a regular  
13 intervenor in Commission proceedings and did not have procedures  
14 or personnel in place to respond quickly to a need to intervene.  
15 Prior to the initial hearing in this proceeding, BOMA attempted  
16 to contact an energy consultant, Mr. Wayne Meek, to assist it.  
17 Unfortunately, Mr. Meek had prior commitments and was out of town  
18 until July. Upon returning, Mr. Meek sought to intervene on  
19 BOMA's behalf in Cause No. UE-920630, the Puget PRAM case. He  
20 then moved expeditiously to identify counsel to represent  
21 Petitioner in that case and to intervene in this proceeding.

22           8. Neither BOMA nor any of its members are members of, or  
23 are affiliated with, any of the existing parties, and, no other  
24 party is authorized to or purports to represent Petitioner or its  
25 members in this proceeding. Moreover, no other existing party is  
26 similarly situated to BOMA's members.

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1           9. No party will be prejudiced or burdened by granting  
2           Petitioner's intervention at this stage of the proceedings.

3           10. We have contacted the attorneys of record for all other  
4           parties to this proceeding. We have confirmed with the attorneys  
5           for the Commission Staff, Puget Sound Power & Light Co., WICFUR,  
6           U.S. Department of Defense, Bellingham Cold Storage, Trident  
7           Seafoods, Versacold, Americold, National Frozen Foods, and  
8           Bellingham Frozen Foods, as well as with Public Counsel, that  
9           they have no objection to Petitioner's intervention.

10           For all the foregoing reasons, Petitioner has a substantial  
11           interest in this proceeding which is not represented adequately  
12           by the other parties. Moreover, Petitioner has demonstrated good  
13           cause why intervention should be granted. No other parties would  
14           be prejudiced by Petitioner's intervention. In any event, no  
15           party objects to BOMA's intervention. Accordingly, BOMA  
16           respectfully requests that the Commission grant its petition to  
17           intervene as a party to this proceeding.

18                       RESPECTFULLY SUBMITTED this 16th day of July, 1992.

19                                       ATER WYNNE HEWITT DODSON & SKERRITT

20  
21           By   
22                       Arthur A. Butler  
23                       Attorneys for BOMA

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*Ater Wynne Hewitt Dodson & Skerritt*  
*Lawyers*  
*1201 Third Avenue, Suite 2850*  
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1 CERTIFICATE OF SERVICE

2 I, Arthur A. Butler, hereby certify that I have this 16th  
3 day of July, 1992, filed the original plus 19 copies of the  
4 foregoing document by first class mail, postage prepaid, and  
5 properly addressed as follows:

6 Paul Curl, Secretary  
7 Washington Utilities and  
8 Transportation Commission  
9 1300 S. Evergreen Park Dr. S.W.  
10 P.O. Box 47250  
11 Olympia, Washington 98504-7250

12 and served a true and correct copy of the foregoing document upon  
13 all counsel of record in this proceeding by first class mail,  
14 postage prepaid, and properly addressed as follows:

15 Donald T. Trotter (Commission)  
16 Assistant Attorney General  
17 1400 S. Evergreen Park Dr. S.W.  
18 P.O. Box 40128  
19 Olympia, Washington 98504-0128

20 James M. Van Nostrand (Puget Sound Power &  
21 Perkins Coie Light Co.)  
22 One Bellevue Center  
23 411 108th Avenue N.E.  
24 Bellevue, Washington 98004

25 Charles F. Adams (Public Counsel)  
26 Assistant Attorney General  
Public Counsel Section  
900 Fourth Avenue, Suite 2000  
Seattle, Washington 98164

27 Grant E. Tanner (WICFUR)  
28 Davis Wright Tremaine  
29 2300 First Interstate Bank Tower  
30 1300 S.W. Fifth Avenue  
31 Portland, Oregon 97201

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1 Carol S. Arnold  
2 Preston Thorgrimson Shidler  
3 Gates & Ellis  
4 5400 Columbia Center  
5 701 Fifth Avenue  
6 Seattle, Washington 98104

(Bellingham Cold Storage,  
Trident Seafoods,  
Versacold, Americold,  
National Frozen Foods,  
Bellingham Frozen Foods)

5 Norman J. Furuta  
6 Associate Counsel (Code 09C)  
7 Office of the General Counsel  
8 Department of the Navy  
9 900 Commodore Drive  
10 San Bruno, CA 94066-2402

(U.S. Department of  
Defense)

9 Alice Haenle, Administrative Law Judge  
10 Office of Administrative Hearings  
11 2420 Bristol Court S.W., 3rd Floor  
12 P.O. Box 42489  
13 Olympia, Washington 98504-2489

14 DATED this 16th day of July, 1992.

15   
16 \_\_\_\_\_  
17 Arthur A. Butler

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