

**BEFORE THE WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION vs. PUGET SOUND ENERGY, INC.	: : : : : : : : : :	DOCKET NO. UE-170033/UG-170034 (Consolidated) LATE-FILED PETITION TO INTERVENE OF THE KROGER CO. ON BEHALF OF THE FRED MEYER STORES AND QUALITY FOOD CENTERS
Complainant		
Respondent		

Pursuant to WAC 480-07-355, The Kroger Co., on behalf of its Fred Meyer Stores (“Fred Meyer”) and Quality Food Centers (“QFC”) divisions, hereby submits this Late-Filed Petition to Intervene. Pursuant to WAC §480-07-340, Kroger states following:

1. Name and Addresses of Petitioner:

Quality Food Centers, Inc.
10116 N.E. 8th Street
Bellevue, WA 98004

Fred Meyer Stores, Inc.
3800 Southeast 2nd Street
Portland, OR 99202

The Kroger Co.
1014 Vine Street, G-07
Cincinnati, Ohio 45202

As required by WAC §480-07-145(2)(d), The Kroger Co. has provided this Petition by electronic mail.

2. Name and Address of Attorney and Consultants Representing Petitioner:

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3. Identify the Petitioner:

Petitioner is a retail electric customer of Puget Sound Electric, Inc. ("PSE"). Petitioner has approximately 66 grocery stores and other facilities that purchase their electric supply from PSE.

4. Petitioner's Interest in this Proceeding:

Kroger is a corporation engaged in the business of selling groceries at retail throughout the United States. One of the largest retail food companies in the United States, Kroger operates approximately 130 grocery stores in the state of Washington under the Fred Meyer and QFC banners. Of that total, 66 purchase their electric supply from PSE. These stores purchase more than 185 million kWh of electricity from PSE annually under various rate schedules and have a peak demand in excess of 27 MW. Petitioner is one of the largest commercial customers served by PSE. The grocery stores operated by Fred Meyer and QFC are high load factor facilities that use energy for food storage, lighting, heating, cooling and distribution, often on a 24 hour a day, 7 day a week basis.

Kroger has a direct and substantial interest in this proceeding that will not be adequately represented by any other party.

5. Issues To Be Raised:

Petitioner will examine proposed tariff changes, revenue requirement and rate design issues.

6. Testimony of Witnesses:

If Petitioner submits written direct testimony or exhibits, it will be prepared by Mr. Kevin C. Higgins, a principal in the firm Energy Strategies, LLC of Salt Lake City, Utah. Petitioner also intends to cross-examine the witnesses called by the other parties to this proceeding and to submit written briefs as appropriate.

7. **Reason For Late-Filed Petition:**

Pursuant to WAC 480-07-355(1)(b), Kroger has good cause for filing an untimely Petition to Intervene. Counsel for Kroger was not aware of the intervention deadline until the date that the Petition was filed. No party will be prejudiced by the granting of this Petition. Kroger has no intention of unreasonably broadening the issues, burdening the record, or delaying the proceeding. Kroger will accept the procedural schedule as it is.

WHEREFORE, for the reasons set forth above, Petitioner respectfully requests that this Petition to Intervene be granted.

DATED this 13th day of February, 2017.

Respectfully submitted,



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COUNSEL FOR THE KROGER CO.

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UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

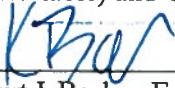
PUGET SOUND ENERGY,

Respondent.

DOCKETS UE-170033 and UG-170034
(Consolidated)

CERTIFICATE OF SERVICE

I hereby certify that I have this day served this document, Late Filed Petition to Intervene of The Kroger Co. upon all parties of record in this proceeding, by e-mail (when available) and U.S. first class mail this 13th day of February, 2017.



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