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BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,  
  
Complainant,  
  
v.  
Puget Sound Energy, Inc.  
  
Respondent.

Docket No. UE-011163

PETITION TO INTERVENE OF  
MICROCHIP TECHNOLOGY,  
INCORPORATED

**1. Name and address of petitioner:**

Microchip Technology, Incorporated (“Microchip”) is a Delaware corporation that is qualified to do business, and is doing business in the State of Washington. Microchip’s addresses is 2355 West Chandler Blvd., Chandler, AZ 85224-6131.

**2. Name and address of attorney representing petitioner:**

Harvard P. Spigal  
Preston Gates & Ellis LLP  
222 SW Columbia, Suite 1400  
Portland, OR 97201-6131  
Business: (503) 228-3200  
Fax: (503) 248-9085

**3. Identity of petitioner:**

Microchip develops and manufactures specialized semiconductor products used for a wide variety of embedded control applications. Microchip is headquartered in Chandler, Arizona, and has

1 design facilities in Mountain View, California, and Bangalore, India; semiconductor fabrication  
2 facilities in Tempe and Chandler, Arizona, and Puyallup, Washington; and assembly and test  
3 operations near Bangkok, Thailand. Microchip employs approximately 2,950 people worldwide and  
4 has sales offices throughout Asia, Europe, Japan and the Americas. Microchip acquired a  
5 semiconductor manufacturing plant in Puyallup, Washington, in July 2000. Microchip plans to  
6 commence production in Puyallup in December 2002. Microchip is a customer of Puget Sound  
7 Energy, Inc. ("PSE"). When in full production, Microchip's Puyallup facility will operate 24 hours  
8 a day, seven days a week, and will take approximately 12 MW of electricity under Schedule 49.

10 **4. Petitioner's participation in other WUTC cases:**

11 Microchip has not participated in prior Commission proceedings.

12 **5. Petitioner's interest in this proceeding:**

13 PSE sells power to Microchip. When production commences, PSE will sell power to  
14 Microchip under Schedule 49.

15 **6. Issues To Be Raised:**

16 PSE filed a Petition for an Order Authorizing Deferral of Certain Electric Energy Supply  
17 Costs and Approving a Tariff Rider for Recovery of Certain Electric Energy Supply Costs.  
18 Microchip believes that the Commission should not approve the proposed Order Authorizing  
19 Deferral of Certain Electric Energy Supply Costs and, therefore, the Commission should not approve  
20 the Tariff Rider for Recovery of Certain Electric Supply Costs.  
21

22 **7. Testimony and Witnesses:**

23 Microchip has not decided at this time whether to submit written testimony or exhibits or call  
24 witnesses, but reserves the right to do so. Microchip intends to cross-examine the witnesses called  
25 by other parties and to submit written argument.  
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**8. The undersigned submits this Petition to Intervene and requests authorization to participate in this proceeding.**

DATED this 31<sup>st</sup> day of September, 2001.

PRESTON GATES & ELLIS LLP

By \_\_\_\_\_  
Harvard P. Spigal, WSBA # 03533  
Of Attorneys for Petitioner  
Microchip Technology, Incorporated

STATE OF OREGON                    )  
  ) ss.  
COUNTY OF MULTNOMAH        )

I, Harvard P. Spigal, affirm that this Petition is true and complete to the best of my knowledge and belief.

\_\_\_\_\_  
Harvard P. Spigal  
Of Attorneys for Petitioner

1 CERTIFICATE OF SERVICE

2 I HEREBY CERTIFY that I have this day served PETITION TO INTERVENE OF  
3 MICROCHIP TECHNOLOGY, INCORPORATED upon all parties of record in this proceeding via  
4 telefacsimile, followed by Federal Express overnight mail, upon:  
5

6 PSE, INC.

7 Markham A. Quehrn  
8 Perkins Coie  
9 One Bellevue Center, Suite 1800  
10 411-108<sup>th</sup> Avenue NE  
11 Bellevue, WA 98004-5584  
12 Ph: 425-453-6980  
13 Fax: 425-453-7350

WUTC

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12 PUBLIC COUNSEL

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14 Office of the Attorney General  
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18 Ph: 206-389-2055  
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Ph: 360-664-1188  
Fax: 360-586-5522

20 DATED at Portland, Oregon this 31<sup>st</sup> day of August, 2001.  
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\_\_\_\_\_  
Harvard P. Spigal