BEFORE THE WASHINGTON

**UTILITIES AND TRANSPORTATION COMMISSION**

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| WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,  Complainant,  v.  PUGET SOUND ENERGYPuget Sound Energy,  PSE  Respondent.  . . . . . . . . . . . . . . . . . . . . . . . . . . . . . . | ) ) ) ) ) ) ) ) ) ) )  ) | DOCKETS UE-151871 and UG-151872  MOTION OF SHEET METAL AND AIR CONDITIONING CONTRACTORS NATIONAL ASSOCIATION, WESTERN WASHINGTON (SMACNA-WW) FOR PERMISSION TO FILE A REPLY IN RESPONSE TO PSE OPPOSITION TO SMACNA’S PETITION TO INTERVENE |

Electric and Natural Gas

1. Pursuant to WAC 480-07-370(1)(d), SMACNA-WW seeks permission to file a reply in response to the opposition to SMACNA-WW’s Petition to Intervene filed by Puget Sound Energy (PSE).
2. Good cause exists to grant this motion because, in its opposition, PSE misstates the interests of SMACNA-WW and raises, and wrongly applies, the case of *Cole v. Utilities & Transportation Comm’n*, 79 Wn.2d 302, 485 P.2d 71 (1971). Further, because this proceeding implicates broad issues of state energy policy, the Commission should consider all information and views, including those on procedural issues.

Dated January 4, 2016.

Respectfully submitted,

*s/Jeffrey D. Goltz*

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