BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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

- 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).
- 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,

Jeffrey D. Goftz

Cascadia Law Group

606 Columbia Street, N.W., Suite 212

Olympia, WA 98501

(360) 528-3026