## BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY

Respondent.

DOCKETS UE-190529 and UG-190530 (Consolidated)

PETITION OF THE FEA TO INTERVENE

- I. Pursuant to WAC 480-07-355 (1), the Secretary of Defense, through authorized counsel, hereby petitions the Washington Utilities and Transportation Commission to intervene in this proceeding on behalf of the consumer interest of the FEDERAL EXECUTIVE AGENCIES ("FEA").
- II. The name, title, mailing address, telephone number, and e-mail address of the person representing FEA in this proceeding and who is authorized to accept service of documents is:

Rita M. Liotta
Counsel
Department of the Navy
One Avenue of the Palms, Suite 161
San Francisco, CA 94130
TEL: (415) 743-4718; FAX: (415) 743-4700
e-mail: rita.liotta@navy.mil

III. In addition, the names, mailing addresses, telephone numbers and e-mail addresses of the expert persons to whom all documents and communication relating to this proceeding should be addressed are:

Kay Davoodi and Larry Allen Utility Rates and Studies Office Naval Facilities Engineering Command-HQ 1322 Patterson Ave SE, Suite 1000 Washington Navy Yard, DC 20374-5065

Respective e-mails & telephone numbers: <a href="mailto:khojasteh.davoodi@navy.mil">khojasteh.davoodi@navy.mil</a> (202)685-3319; <a href="mailto:larry.r.allen@navy.mil">larry.r.allen@navy.mil</a> (202)685-3320.

- IV. If the Commission should grant this Petition to Intervene, FEA waives service of process by means of personal delivery, United States mail, and parcel delivery service pursuant to WAC 480-07-150 (5) for all paper documents that are available in complete form by electronic means, provided that such documents are delivered electronically to the e-mail addresses (or by electronic media such as compact disk to the mailing addresses) set forth in Paragraphs II and III of this Petition.
- V. FEA maintains military installations and civilian activities within the State of Washington that receive electrical service from Puget Sound Energy ("PSE"). As a large user of electrical service provided by PSE, FEA has a significant interest in this proceeding and would be substantially affected by its outcome. No other party can adequately represent FEA's interest. FEA's participation can assist in the development of a sound record and is not expected unduly to broaden the issues or

delay the proceedings.

VI. FEA wishes to reserve the ability to submit written testimony and exhibits in this hearing. FEA anticipates it will cross-examine witnesses called by other parties and submit written arguments and/or motions.

WHEREFORE, the FEDERAL EXECUTIVE AGENCIES seek leave to intervene and to be treated as a party to this proceeding.

Respectfully submitted,

/s/ Rita Liotta

DATED: July 15, 2019 RITA M. LIOTTA Counsel for the FEA

STATE OF CALIFORNIA )

CITY AND COUNTY OF SAN FRANCISCO)

I, Rita M. Liotta, affirm that this petition is true and complete to the best of my knowledge and belief.

/s/ Rita Liotta

RITA M. LIOTTA Counsel for the FEA