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January 27, 2000

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Carole J. Washburn
Secretary
Washington Utilities and Transportation Commission
1300 SW Evergreen Park Drive, S.W.
Olympia WA 98504-7250

Re: In the Matter of the Application of Puget Sound Energy, Inc. for an Order Approving a
Corporate Reorganization to Create a Holding Company, Puget Energy, Inc.
Docket No. UE-991779

Dear Ms. Washburn:

Enclosed please find an original and nineteen copies of the PETITION OF
INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES FOR LEAVE TO INTERVENE
in the above-captioned matter.

Please return one file-stamped copy of the Petition to Intervene in the
postage-prepaid envelope provided. Thank you for your assistance.

Sincerely yours,



Melinda J. Davison

Enclosures
cc: Service List

RECEIVED
REGISTRATION DIVISION
00 JAN 28 PM 3:39
STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

BEFORE THE

RECEIVED
RECORDS MANAGEMENT

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

00 JAN 28 PM 3:39

STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

| | | |
|-------------------------------------|---|------------------------|
| In the Matter of the Application of |) | |
| |) | DOCKET NO. UE-991779 |
| PUGET SOUND ENERGY, INC. |) | |
| |) | PETITION OF INDUSTRIAL |
| for an Order Approving a Corporate |) | CUSTOMERS OF NORTHWEST |
| Reorganization to Create a Holding |) | UTILITIES FOR LEAVE TO |
| Company, Puget Energy, Inc. |) | INTERVENE |
| _____ |) | |

Pursuant to WAC 480-09-430, the Industrial Customers of Northwest Utilities (“ICNU”) petitions the Washington Utilities and Transportation Commission (“WUTC”) to intervene in this proceeding with full party status. In support of its petition, ICNU represents as follows:

1. The business address of ICNU is:

Ken Canon
 Industrial Customers of Northwest Utilities
 825 NE Multnomah, Suite 180
 Portland, OR 97232

2. ICNU will be represented in this proceeding by Duncan, Weinberg, Genzer & Pembroke, P.C. All documents relating to these proceedings should be served on ICNU’s attorney and consultant at the following addresses:

Melinda J. Davison
 Duncan, Weinberg, Genzer & Pembroke, P.C.
 1300 SW Fifth Avenue, Suite 2915
 Portland, OR 97201
 (503) 241-7242 phone
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 dunwei@ibm.net

Linc Wolverton
East Fork Economics
35011 North Fork Road
PO Box 620
La Center, WA 98629
lwolv@worldaccessnet.com

3. ICNU is an incorporated, non-profit association of large industrial electric customers in the Pacific Northwest. A list of ICNU members is included as Attachment A. Many members of ICNU are customers of Puget Sound Energy, Inc. ("PSE"), including Air Liquide, Air Products, the Boeing Company, Equilon Enterprises LLC, Tesoro Northwest Company, and Weyerhaeuser.

4. ICNU's member companies have a substantial interest in the impacts of a corporate reorganization by PSE to create a holding company, which could effect the rates and quality of service that PSE provides to ICNU's members.

5. As described above, ICNU has a direct and substantial interest in this proceeding that will not be adequately represented by any other party, and may be effected by any Commission determination made in connection with these proceedings. It is in the public interest to allow ICNU to intervene in this proceeding. ICNU, therefore, requests that the Commission grant its Petition to Intervene and make ICNU a party to this proceeding.

6. ICNU believes its participation in this proceeding will assist the Commission in its consideration of the customer impacts of the sale. Furthermore, ICNU's intervention in this proceeding will not unreasonably broaden the issues, burden the record, or delay this proceeding.

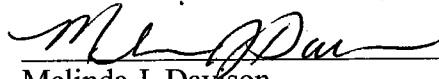
WHEREFORE, ICNU respectfully requests that the Commission grant its petition to intervene with full party status in this proceeding.

PETITION TO INTERVENE OF ICNU – PAGE 2

DUNCAN, WEINBERG, GENZER & PEMBROKE, P.C.
1300 SW Fifth Avenue, Suite 2915
Portland, OR 97201
Telephone (503) 241-7242

DATED this 27th day of January, 2000

DUNCAN, WEINBERG, GENZER & PEMBROKE, P.C.



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Of Attorneys for ICNU

PETITION TO INTERVENE OF ICNU – PAGE 3

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ATTACHMENT A
INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

Agilent Technologies
* Air Liquide
* Air Products
Atlantic Richfield
BFGoodrich Kalama, Inc.
Bellingham Cold Storage
Birmingham Steel
* Boeing
Boise Cascade
Coastal St. Helens Chemical
Daishowa America
Davidson Industries, Inc.
Eagle-Picher Minerals, Inc.
* Equilon Enterprises LLC
Evanite Fiber
Fort James Corp.
Georgia-Pacific
Hewlett-Packard
Inland Empire Paper Co.
Intel
International Paper
J.R. Simplot
James Hardie Gypsum, Inc.
Kimberly-Clark Corporation
Lamb Weston
Longview Fibre
Nabisco, Inc.
NorPac Foods
Oregon Steel
Oremet-Wah Chang
PCC Structurals, Inc.
Pioneer Americas, Inc.
Ponderay Newsprint Co.
Pope and Talbot, Inc.
Potlatch Corporation
Simpson Paper
Simpson Timber
Smurfit Newsprint
Sonoco Products Company
* Tesoro Northwest Company
* Weyerhaeuser
Willamette Industries

*Denotes PSE customer.

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing PETITION OF INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES FOR LEAVE TO INTERVENE upon the parties on the official service list in this proceeding by depositing same in the United States Mail at Portland, Oregon, postage prepaid.

DATED this 27th day of January, 2000.

DUNCAN, WEINBERG, GENZER & PEMBROKE, P.C.

By:



Melinda J. Davison

CERTIFICATE OF SERVICE -- 1

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