

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION)	DOCKET NO. UE-031725
)	
Complainant,)	
)	
v.)	
)	
PUGET SOUND ENERGY, INC.)	
)	
Respondent.)	
_____)	

**PETITION TO INTERVENE OF
COGENERATION COALITION OF WASHINGTON**

1. Pursuant to WAC § 480-09-430, the Cogeneration Coalition of Washington (CCW)¹ petitions the Washington Utilities and Transportation Commission (Commission) for leave to intervene in the above-referenced docket, as an intervenor with full party status as described in WAC § 480-09-430(3).

2. Communications and correspondence regarding this proceeding shall be directed to:

Michael P. Alcantar
Donald Brookhyser
Alcantar & Kahl LLP
1300 SW Fifth
Suite 1750
Portland OR 97201
503.402.9900 office
503.402.8882 fax
mpa@a-klaw.com
deb@a-klaw.com

James Ross
RCS, Inc.
500 Chesterfield Center
Suite 320
Chesterfield MO 63017
636.530.9544 office
636.530.9447 fax
jimross@r-c-s-inc.com

¹ CCW represents the cogeneration and customer interests of March Point Cogeneration Company, Sumas Energy Company and Tenaska Cogeneration.

3. CCW's members are all Qualifying Facilities with long-term power purchase agreements with PSE. In addition, CCW's members are retail customers of PSE. In both roles, CCW's members will have a direct and substantial interest in this rate filing.

First, as suppliers, CCW has a substantial interest in PSE's financial condition. CCW is particularly concerned about a rate structure which allows PSE, under prudent management, to pay its suppliers on a timely basis. It was on this basis that CCW intervened in PSE's last general rate case and supported the creation of the PCA mechanism.

As suppliers with agreements that will terminate in 2012 – 2013, CCW is also vitally interested in PSE's procurement of long-term resources.

As customers, CCW's members are concerned about any increase in their rates, and whether such increase is justified by PSE's increased costs.

4. These represent direct and substantial interests which will not be adequately represented by any other party. As suppliers, CCW's participation in this proceeding will assist the Commission. CCW therefore requests leave to intervene in this matter, and to fully participate, including the right to offer evidence and to provide legal argument.

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WHEREFORE, CCW respectfully petitions the Commission for leave to intervene in this proceeding with the full rights of a party.

Dated this 5th day of November, 2003.

Respectfully submitted,

Michael Alcantar
Donald Brookhyser
Alcantar & Kahl LLP
1300 SW Fifth
Suite 1750
Portland OR 97210
503.402.9900 phone
503.402.8882 fax
mpa@a-klaw.com
deb@a-klaw.com
Counsel to NIEC