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BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION
COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,)	DOCKET NO. UE-040641
)	DOCKET NO. UG-040640
Complainant,)	PETITION FOR INTERVENTION
vs.)	
PUGET SOUND ENERGY, INC.,)	
Respondent.)	

Seattle Steam Company ("Seattle Steam") hereby moves to intervene in the above-captioned proceeding pursuant to WAC 480-09-430. In support of its petition, Seattle Steam states as follows:

1. Seattle Steam purchases natural gas transportation service from Puget Sound Energy, Inc. ("PSE") under PSE Schedule 57. Any changes to these tariff rates in Docket No. UG-040640 could substantially impact Seattle Steam's business. Based on PSE's prefiled testimony and exhibits, Schedule 57 provides a "Realized Rate of Return on Net Investment" to PSE of 15.97%, compared to a negative 2.24% rate of return from Schedule 87 (Interruptible Sales Service) and a 6.38% rater of return for the gas operations overall. In spite of this disparity, PSE is proposing identical increases in the unit delivery charges for both Schedules 57 and 87, which Seattle Steam does not believe is fair, just or reasonable.

1 2. Since PSE has both electric and gas operations, there are many services which are
2 shared between them such as meter reading, billing, purchasing, accounting and customer
3 service. Thus, there may become a question of the proper allocation of the costs of any shared
4 services to be recovered in electric and gas rates. Therefore, Seattle Steam requests permission
5 to intervene in both dockets.

6 3. At this time, Seattle Steam does not seek to modify or expand the issues before
7 the Commission in this proceeding. Seattle Steam is not represented by any other party in this
8 proceeding and intervention is necessary in order to adequately protect Seattle Steam's interests.

9 4. Seattle Steam's business address is:

10 Seattle Steam Company
11 1325 Fourth Avenue
12 Suite 1440
13 Seattle, Washington 98101

14 For Seattle Steam, copies of all pleadings, correspondence and documents filed in
15 these proceedings should be sent to:

16 Robert B. Sheppard
17 30 Glacier Key
18 Bellevue, Washington 98006

19 5. The name and address of Seattle Steam's attorneys in this proceeding are:

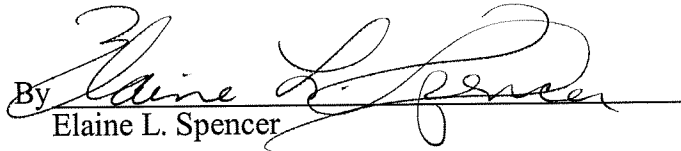
20 Elaine L. Spencer
21 Graham & Dunn PC
22 Pier 70
23 2801 Alaskan Way, #300
24 Seattle, Washington 98121
25 Telephone: (206) 624-8300
26 espencer@grahamdunn.com

 6. Seattle Steam reserves its right at this time to submit written testimony and
exhibits, call witnesses, cross examine witnesses called by other parties and submit written
arguments and/or motions.

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WHEREFORE, Seattle Steam respectfully petitions the Commission for leave to
intervene in this proceeding, and the right to participate in any hearings therein.


GRAHAM & DUNN PC

By 
Elaine L. Spencer

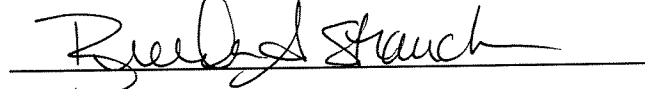
STATE OF WASHINGTON)
) ss.
COUNTY OF KING)

I, Elaine L. Spencer, being first duly sworn on oath, depose and say:

I am the attorney for Seattle Steam Company, Intervenor herein. I have read the
foregoing Petition for Intervention and I hereby verify that the facts set forth therein are true to
the best of my knowledge.


ELAINE L. SPENCER

SUBSCRIBED AND SWORN TO before me this 30th day of April, 2004.


(Signature)

BRENDA A. STRAUCH

(Please print name legibly)

NOTARY PUBLIC in and for the State of
Washington, residing at MAPLE VALLEY.
My commission expires: 9/16/04.

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CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of April, 2004, I served a copy of Petition for Intervention by mailing a copy of same via First Class Mail, postage prepaid, at Seattle, King County, Washington, pursuant to WAC 480-07-150(6), to all parties listed below who are on the official service list in Docket No. UE-040641 and UG-040640:

Washington Utilities and Transportation
Commission
Chandler Plaza Building
1300 S. Evergreen Park Drive S.W.
Olympia, WA 98504-7250
Phone: 360-664-1160

Simon J. ffitc
Public Counsel Section
Office of Attorney General
900 Fourth Avenue, Suite 2000
Seattle, WA 98164-1012
Phone: 206-464-7744
Fax: 206-389-2058
Email: simonf@atg.wa.gov

Robert D. Cedarbaum, Senior Counsel
Shannon E. Smith, Assistant AG
1400 S. Evergreen Park Drive SW
PO Box 40128
Olympia, WA 98504-0128
Phone: 360-664-1188
Fax: -360-586-5522
Email: bcedarba@wutc.wa.gov
Email: ssmith@wutc.wa.gov

Mike Kurtz
Boehm, Kurtz and Lowry
2110 CBLD Center
36 East Seventh St.
Cincinnati, OH 45202
Phone: 513-421-2255
Fax: 513-421-2764
Email: mkurtzlaw@aol.com

Puget Sound Energy, Inc.
PO Box 97034
Bellevue, WA 98009-9734

Danielle Dixon
Policy Associate
NW Energy Coalition
219 First Avenue, Suite 100
Seattle, WA 98104
Phone: 206-621-0094
Fax: 206-621-0097
Email: danielle@nwenergy.org

1 Markham A. Quehm
2 Kirstin S. Dodge
3 William R. Mauer
4 Perkins Coie LLP
5 One Bellevue Center
6 411 - 108th Avenue NE, Suite 1800
7 Bellevue, WA 98004-5584
8 Phone: 425-635-1400
9 Fax: 425-635-2400
10 Email: ksdodge@perkinscoie.com

8 Paula E. Pyron
9 Executive Director
10 Northwest Industrial Gas Users
11 4113 Wolf Berry Court
12 Lake Oswego, OR 97035-1827
13 Phone: 503-636-2580
14 Fax: 503-636-0703
15 Email: ppyron@nyigu.org

12 S. Bradley Van Cleve
13 Davison Van Cleve
14 1000 SW Broadway, Suite 2460
15 Portland, OR 97205
16 Phone: 503-241-7242
17 Fax: 503-241-8160
18 Email: mail@dvclaw.com

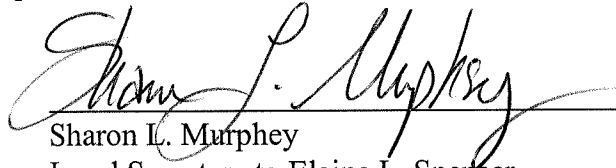
16 Mr. Robert Sheppard
17 30 Glacier Key
18 Bellevue, WA 98006

Edward A. Finklea
Chad Stokes
Cable Huston Benedict Haagensen & Lloyd
1001 SW Fifth Avenue, Suite 2000
Portland, OR 97204
Phone: 503-224-3092
Email: efinklea@chbh.com

Ronald L. Roseman
2011 - 14th Avenue East
Seattle, WA 98112
Phone: 206-324-8792
Fax: 206-568-0138
Email: ronroseman@comcast.net
or rros@aol.com

Donald W. Schoenback
Regulatory & Congeneration Services, Inc.
900 Washington Street, Suite 1000
Vancouver, WA 98660

19 EXECUTED this 30th day of April, 2004, at Seattle, King County, Washington.

20
21 
22 Sharon L. Murphey
23 Legal Secretary to Elaine L. Spencer
24
25
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