

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION

Complainant,

v.

PUGET SOUND ENERGY, INC.

Respondent.

DOCKET UE-031725

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

1. Pursuant to WAC §480-09-430, the Cogeneration Coalition of Washington (CCW)<sup>1</sup> petitions the Washington Utilities and Transportation 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. CCW had previously delivered to the Commission an electronic copy of a Petition to Intervene on November 5, 2003, and filed the original of the Petition on November 10, 2003. The Presiding ALJ denied CCW intervention in Procedural Order #3 issued on November 12, 2003. CCW hereby renews its Petition, requests that the Presiding ALJ reconsider his denial, and asserts good cause for granting the Petition.

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

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

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4. 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 Power Cost Adjustment 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.

5. 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.

6. There is good cause to grant this motion. CCW timely delivered a copy of the original Petition electronically to the Commission and to the other parties prior to the Prehearing Conference. Counsel believed that such electronic filing was sufficient to place the request before the Commission. This belief was reinforced by the erroneous assumption that electronic filings allowed in the prior Puget general rate case would continue to be allowed in this Power Cost Adjustment case.

7. Notice of this Petition was made to other parties prior to the Prehearing Conference, and no party would be prejudiced by granting this Petition. CCW's members, both as wholesale suppliers and as standby customers, have substantial interests to be protected in this case, and should be allowed to participate and protect such interests.

8. CCW agrees to be bound by the Procedural Schedule and all other determinations made by the Commission in this matter to this date.

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

Dated this 14th day of November, 2003.

Respectfully submitted,

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