

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In The Matter Of The Joint Application Of
Puget Sound Energy, Alberta Investment
Management Corporation, British
Columbia Investment Management
Corporation, Omers Administration
Corporation, And Pggm Vermogensbeheer
B.V. For An Order Authorizing Proposed
Sales Of Indirect Interests In Puget Sound
Energy

DOCKET U-180680

**PETITION TO INTERVENE
OF J. RICHARD LAUCKHART**

1 Pursuant to WAC § 480-07-355, J. Richard Lauckhart (Lauckhart) petitions the Washington Utilities and Transportation Commission (“WUTC” or “Commission”) for leave to intervene in the above-captioned proceeding, as an intervenor with full party status as described in WAC § 480-07-340. The business address of Lauckhart is:

44475 Clubhouse Drive
El Macero, California 95618

All documents relating to these proceedings should be served on Lauckhart at the following address:

44475 Clubhouse Drive
El Macero, California 95618

2 The administrative rules at issue are WAC § 480-07-340, -355.

3 Lauckhart is uniquely qualified to provide needed testimony to the WUTC on this matter as evidenced by his background (having served as both an employee and officer of Puget for 22 years), by the 17 documents he filed in PSE’s most recent IRP [Docket No. UE-160918, and the documents he has already filed in this proceeding.

4 Lauckhart is uniquely qualified to intervene in this proceeding to ensure that the Public Interest will not be harmed by the proposed change in ownership. Lauckhart has pointed out the abuses

of the system the past owner has attempted to promulgate on PSE customers in the interest of building unneeded transmission in order to enhance their profits. Lauckhart seeks to intervene in this proceeding to ensure that the proposed acquisition complies with Washington law and will not harm PSE's customers. Lauckhart requests leave to intervene in this docket to represent PSE customers who are being harmed now and likely will be harmed in the future if certain conditions are not imposed on approval of this transfer of ownership.

- 5 Lauckhart's intervention in this proceeding will assist the Commission in resolving the issues and will not unreasonably broaden the issues, burden the record, or delay this proceeding. Lauckhart also has extensive involvement in the recent PSE IRP and has pointed out the problems with PSE transmission planning in that proceeding. The WUTC has acknowledged these problems in its May 7, 2018 Acknowledgement Letter on the IRP. Lauckhart has also participated in the EIS process for Energize Eastside conducted at the City of Bellevue and has filed comments with the Cities of Bellevue, Newcastle, and Redmond indicating that Energize Eastside is not needed and that project is an attempt by Macquarie to build an unnecessary, environmentally problematic, dangerous project that is being proposed in order to enhance the owner's profitability. Lauckhart will propose conditions on this new ownership transfer that will prohibit these behaviors by the new owners. Lauckhart has substantial interest in this proceeding that will not be adequately represented by any other party.
- 6 Lauckhart has asked Public Counsel to allow him to testify in this proceeding as an expert for them under their intervention. However, the short time allowed for requests for intervention has not allowed that communication to mature. If Public Counsel agrees that Lauckhart can be an expert witness under their intervention, then Lauckhart would withdraw this request for leave to intervene in this proceeding.

7 It is in the public interest to allow Lauckhart to intervene in this proceeding. Lauckhart,
therefore, requests that the Commission grant his Petition to Intervene and make Lauckhart a
party to this proceeding.

8 WHEREFORE, Lauckhart respectfully petitions the Commission for leave to intervene in this
proceeding.

Dated this 11th day of November, 2018.

Respectfully submitted,

A handwritten signature in cursive script that reads "J. Richard Lauckhart". The signature is written in black ink and is positioned above the printed name.

J. Richard Lauckhart