

**BEFORE THE WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY, INC.,

Respondent.

Docket No. UE-040641

**PETITION TO INTERVENE BY AT&T  
WIRELESS SERVICES, INC.**

**PETITION TO INTERVENE**

1. Pursuant to WAC 480-09-430, AT&T Wireless Services, Inc. (“AWS”) hereby petitions the Commission for leave to intervene in the above-entitled docket. As grounds for intervention,

AWS states the following:

2. **Names and address of petitioner:**

AT&T Wireless Services, Inc.  
7277 164<sup>th</sup> Avenue, NE  
Redmond, Washington 98052

3. **Name and address of attorney representing petitioner:**

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With a copy to:

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4. **Identity of petitioner:**

AWS is a leading provider of advanced wireless services – for both voice and data – for consumers and businesses in Washington and throughout the world. It owns and operates an electronic data center in Bothell, Washington, from which it provides its customers with electronic data storage, internet access and e-commerce transactional abilities, web hosting services, virtual private network support, and computing capability.

5. **Reason for intervention:**

The Bothell data center is within PSE's service territory. Service to this facility, as well as service to two other data centers, began under special contracts with PSE approved by the Commission in Docket No. UE-010525. Then, as the result of AWS' participation as a party in PSE Docket No. UE-011570, the data centers became Schedule 31 customers. The AWS data center load continues to grow, consistent with the projections provided the Commission in Docket No. UE-010525. PSE's proposed electric rate increase would increase the cost of electric service to AWS and affect its competitive position in Washington and worldwide.

6. **Issues to be raised:**

AWS is concerned about the overall level of PSE's electric rates and about the design of certain of those rates.

7. **Testimony of witnesses:**

If Petitioner submits written direct testimony or exhibits, it will be prepared by its engineer responsible for utility services, Mr. William Hunter. Testimony of outside experts may

also be required. AWS also intends to cross examine the witnesses called by the other parties to this proceeding and to submit written briefs as appropriate.

8. **Request:**

AWS respectfully requests that its intervention in this proceeding be officially granted pursuant to WAC 480-09-430. AWS represents the interests of itself and other PSE's internet data center customers, whose interests cannot adequately be represented by any other party to this proceeding. The appearance of and participation by AWS will not unreasonably broaden the issues, burden the record, or unreasonably delay this proceeding. AWS will abide by the procedural schedule adopted for this case.

WHEREFORE, AWS prays for leave to intervene as a party to this proceeding.

RESPECTFULLY SUBMITTED this 10th of May, 2004.

DAVIS WRIGHT TREMAINE LLP  
Attorneys for AT&T WIRELESS SERVICES, INC.

By: /s/ John A. Cameron  
John A. Cameron  
DAVIS WRIGHT TREMAINE LLP

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have this 10th day of May, 2004, served the foregoing Petition to Intervene by AT&T Wireless Services, Inc. upon parties of record in this proceeding, as follows:

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