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May 11, 2004

STATE OF CASIL UTIL: AND TRAMSP. COMMINISTERS

Secretary
Washington Utilities and Transportation Commission
1300 Evergreen Park Drive SW
PO Box 47250
Olympia, WA 98504-7250

Re Docket UG-040640/UE0406041

Dear Secretary:

Enclosed is an original and twelve copies of the **Motion to Intervene of The Cogeneration Coalition of Washington** in the above docket. Also enclosed are two additional copies of the filing. Please file stamp and return them in the enclosed self-addressed envelope. Thank you.

Sincerely,

Donald Brookhyser

BEFORE THE

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION) DOCKET NO. UG-040640
Complainant,) DOCKET NO. UE-040641)
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 RECORDS AND SANDER STANDARD TRANSP.

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. These generators are retail customers of PSE in that they purchase standby service as needed under PSE's Schedule 31. The application in this docket proposes substantial increases both in the energy charge and demand charge under Schedule 31. As customers, CCW's members are concerned about any increase in their rates, and whether such increase is justified by PSE's increased costs. CCW's members will have a direct and substantial interest in this rate filing.
- 4. These represent direct and substantial interests which will not be adequately represented by any other party. CCW therefore requests leave to intervene in this matter, and to fully participate, including the right to offer evidence and to provide legal argument.

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

Dated this 11th day of May, 2004.

Respectfully submitted,

Michael Alcantar

Donald Brookhyser

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