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BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of Puget Sound Energy, Inc., Docket No. UE-010010
For a Declaratory Order and Accounting Order
Regarding the Classification of Certain MOTION OF TENASKA WASHINGTON
Facilities and Accounting Treatment PARTNERS, L.P. FOR LATE
Consistent Therewith INTERVENTION

On January 2, 2001, Puget Sound Energy, Inc. ("Puget Sound") filed with the Washington Utilities and Transportation Commission ("WUTC") a Petition for Declaratory Order and an Accounting Order, as referenced in the above docket.

Tenaska Washington Partners, L.P. ("TWP"), pursuant to WAC 480-09-430, hereby moves to intervene in the above-mentioned proceeding. As grounds justifying its late intervention, TWP states that it has substantial interest in this proceeding as set forth below and that its management was unaware of Puget Sound's Petition for a Declaratory Order in this docket until February 27, 2001.

INTEREST OF TENASKA

TWP is a Washington Limited Partnership formed to construct, own and operate a 245

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MW cogeneration facility in or near Ferndale, Washington. TWP sells power generated from the facility it operates in Ferndale, Washington, to Puget Sound under a Long-Term Power Supply Contract. TWP's facility is interconnected with Puget Sound's 115 kV transmission system and TWP relies on this system for delivering its power.

As demonstrated in TWP's comments in this Docket, the interests of TWP will be directly affected by the determinations herein. No other party represents the interests of TWP in this proceeding. For these reasons, TWP has good cause to intervene in this proceeding, and such intervention is in the public interest.

TWP requests in its comments that the WUTC permit discovery of the Power Flow Study and any assumptions made by Puget Sound and any other documents relevant to ascertaining whether the 115 kV lines in Whatcom County, Washington serve a distribution or transmission function. TWP additionally requests the opportunity to comment further after reviewing discovery and to submit additional comments and evidence that the lines in question serve transmission function.

SERVICE INFORMATION

TWP requests that the following names be added to the official service list for this proceeding and that communications and correspondence concerning this proceeding should be directed to:

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Vice President
Tenaska
1044 N. 115 Street, Suite 400
Omaha, NE 68154-4446
Telephone: (402) 691-9500
Fax: (402) 692-9575
and
James F. Fell

1
2 Stoel Rives LLP
3 900 SW Fifth Avenue, Suite 2600
4 Portland, OR 97204
5 Telephone: (503) 294-9343
6 Fax: (503) 220-2480

7
8
9 **CONCLUSION**

10 WHEREFORE, TWP respectfully requests that it be allowed to intervene as a party in
11 this proceeding and that its designated representatives be added to the official service list.
12

13 Respectfully submitted this 28th day of February, 2001.

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James F. Fell
Of Attorneys for
Tenaska Washington Partners, L.P.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the ____ day of February, 2001, I mailed a true and correct copy of the Motion of Tenaska Washington Partners, L.P. for Late Intervention, postage prepaid by U.S. Mail and addressed as follows:

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