

**BEFORE THE WASHINGTON STATE  
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,	)	DOCKET NO. PG-041624
	)	
Complainant,	)	PETITION OF CITY OF BELLEVUE
	)	TO INTERVENE
v.	)	
	)	
PUGET SOUND ENERGY,	)	
	)	
Respondent.	)	
_____	)	

THE CITY OF BELLEVUE, by and through its counsel, Lori M. Riordan, Acting City Attorney, makes the following petition to intervene in the above-captioned proceedings:

**I. Identity of Petitioner Intervenor**

Intervenor Petitioner is the City of Bellevue, a municipal corporation organized under the laws of the State of Washington. Intervenor Petitioner's business address is: 11511 Main Street, P. O. Box 90012, Bellevue, WA 98009-9012.

**II. Interests of Petitioner Intervenor**

Intervenor Petitioner has an interest in these proceedings for the following reasons: 1) The explosion that occurred on September 2, 2004 occurred in a household located within the corporate boundaries of the City of Bellevue; 2) The City's fire and police personnel are "first responders" in any emergency situation within Bellevue and have responsibility for public safety functions of the

City; 3) Respondent PSE provides residential and commercial natural gas service to citizens and businesses throughout the City; 4) Employees and independent contractors of the City work in close proximity to PSE gas lines on a daily basis, including situations where they are working within enclosed spaces where they could be exposed to accumulations of natural gas that has leaked from damaged PSE pipes; 5) The City's Transportation Department issues right-of-way use permits to PSE and other entities to coordinate and conduct work within the right of way; and 6) PSE is subject to a franchise agreement with the City that governs certain aspects of PSE's use of the City's right of way and activities within the City. The City has a strong interest on behalf of itself, its employees and its citizens in ensuring that any remedy fashioned by the Commission and agreed to by PSE adequately addresses the immediate concerns for public safety in the aftermath of the failure of the pipe and resulting explosion. In addition, the City has a strong interest in ensuring that those ongoing problems with PSE's safety and inspection programs outlined in the June 2004 Complaint filed by Commission staff are also addressed to the extent that they have also been raised in this recent emergency proceeding.

### **III. Intervenor Petitioner's Position Regarding the Matter in Controversy**

Intervenor Petitioner Bellevue's position is that the Complaint filed by Commission staff is appropriate and necessary given the circumstances. The City urges the Commission to accept the recommendations of Commission staff and impose those remedies outlined in the Complaint. In addition, the City urges the

Commission to take a strong stance with respect to oversight of the investigation of the cause of the explosion of September 2, 2004 and with respect to inspection of PSE's distribution facilities to determine the extent of the failure of the cathodic protection system and the extent of corrosion and leaks throughout the system.

#### **IV. Issues**

Intervenor Petitioner Bellevue does not seek to broaden the issues raised in the Complaint.

#### **V. Intervenor Petitioner's Counsel**

Intervenor Petitioner is represented by Counsel of Record, Lori M. Riordan, Acting City Attorney. Address: Bellevue City Attorney's Office, 11511 Main Street, P. O. Box 90012, Bellevue, WA 98009-9012; Telephone: (425)452-6829; Facsimile (425)452-7256. A Notice of Appearance is attached hereto.

Respectfully submitted this 15<sup>th</sup> day of September, 2004.

OFFICE OF THE CITY ATTORNEY  
CITY OF BELLEVUE

By \_\_\_\_\_  
Lori M. Riordan, WSBA#16386  
Acting City Attorney  
Attorney for Intervenor Petitioner  
City of Bellevue