

RECEIVED
RECORDS MANAGEMENT

99 NOV -3 AM 9:16

STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

BEFORE THE WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION

In the Matter of Application of

PUGET SOUND ENERGY, INC.

for (1) Approval of the Proposed Sale of
PSE's Share of the Centralia Facilities, and
(2) Authorization to Amortize Gain Over a
Five-Year Period.

DOCKET NO. UE-991409

In the Matter of Application of

AVISTA CORPORATION

for Authority to Sell Its Interest In the
Coal-Fired Centralia Power Plant.

DOCKET NO. UE-991255

In the Matter of Application of

PACIFICORP

for an Order Approving the Sale of its
Interest in (1) The Centralia Steam Electric
Generating Plant, (2) The Ratebased
Portion of the Centralia Coal Mine, and (3)
Related Facilities; For a Determination of
the Amount of and the Proper Ratemaking
Treatment of the Gain Associated with the
Sale; and for an EWG Determination.

DOCKET NO. UE-991262

**INTERVENOR INTERNATIONAL
UNION OF OPERATING ENGINEERS
LOCAL 612'S STATEMENT OF
ISSUES**

ORIGINAL

AWD

Hard Copy

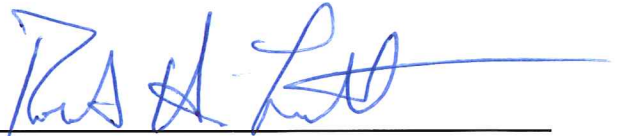
In response to the Commission's Notice of Prehearing Conference (October 28, 1999), Intervenor International Union of Operating Engineers, Local 612 ("Local 612" or "the Union") submits the following issue statement regarding the above captioned applications.

Local 612 represents approximately 400 workers at the Centralia Coal Mine and has served as the collective bargaining representative since 1971. The Union and the Mine are currently under a three-year collective bargaining agreement.

The Union has a direct substantial interest in the prompt approval of the proposed sale of the Centralia Power Plant and Coal Mine to TECWA Power, Inc. Local 612 members depend on the uninterrupted operation and success of the Centralia Coal Mine and Power Plant for their livelihood. Likewise, the economic well being of the community of Centralia relies on the Plant and Mine's continued success. Of equal importance to Local 612 is the safety of the Centralia operation with respect to workers and the surrounding community. This extends to the environmental impact of the Centralia operation. Additionally, the Union has an interest in the cost and quality of service provided to Washington's energy consumers.

In view of the foregoing issues and concerns, Local 612's position is that the proposed sale of the Centralia operations to TECWA Power, Inc. is in the public's interest and warrants the prompt approval by this Commission.

RESPECTFULLY SUBMITTED this 26th day of October 1999.

A handwritten signature in blue ink, appearing to be "Elizabeth Ford", written over a horizontal line.

Elizabeth Ford, WSBA No. 22044
Robert H. Lavitt, WSBA No. 27758
SCHWERIN CAMPBELL BARNARD LLP
18 West Mercer, Suite 400
Seattle, WA 98119
(206) 285-2828
Fax: 206-378-4132

Attorneys for IUOE Local 612

SERVICE LIST

On this 26th day of October, 1999, I caused the original Statement of Issues on behalf of IUOE, Local 612 in the applications of Puget Sound Energy, Avista Corp., and Pacific Corp, to be faxed to and sent via first class postage pre-paid mail to:

Carol Washburn
Washington State Utilities
and Transportation Commission
Chandler Plaza Building
1300 South Evergreen Park S.W.
Olympia, Washington 98052

and copies were sent via first class postage pre-paid mail to:

Thomas D. Dukich
Manager Rates & Tarrif Admin.
Avista Corporation
P.O. Box 3727
Spokane, WA 99220

David J. Meyer, Sr.
Vice President & General Counsel
Avista Corporation
P.O. Box 3727
Spokane, WA 99220

Christy Omohundro
Puget Sound Energy, Inc.
411 108th Avenue, N.E., Suite 300
Bellevue, WA 98004

Kimberly Harris
Assistant General Counsel
Puget Sound Energy, Inc.
411 108th Avenue N.E., Suite 1500
Bellevue, WA 98004

Robert D. Cedarbaum
Assistant Attorney General
1400 S. Evergreen Park Drive S.W.
P.O. Box 40128
Olympia, WA 98504-0128

Anne E. Eakin
Pacific Power & Light Company
825 NE Multnomah St., Suite 625
Portland, OR 97232

C. Alex Miller
Managing Director of Planning
Pacifcorp
825 NE Multnomah, Suite 600
Portland, OR 97232

George M. Galloway
Stoel Rives LLP
900 S.W. Fifth Avenue, Suite 2600
Portland, OR 97204-1268

James C. Paine
Stoel Rives LLP
900 S.W. Fifth Avenue, Suite 2600
Portland, OR 97204-1268

Ken Canon
Industrial Customers of NW Utilities
825 NE Multnomah, Suite 180
Portland, OR 97232-2158

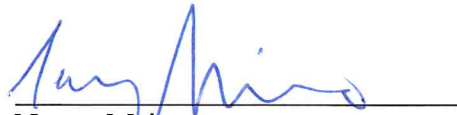
Lincoln Wolverton
East Fork Economics
P.O. Box 620
La Center, WA 98629

Michael Brooks
Duncan Weinberg Genzer & Pembroke
1300 SW Fifth Avenue, Suite 2915
Portland, OR 97201

Jeffrey Goltz
Assistant Attorney General
WUTC
State Mail Stop 40128
Olympia, WA 98052

Washington Utilities and
Transportation Commission
1300 S. Evergreen Park Drive S.W.
P.O. Box 47250
Olympia, WA 98504-7250

Simon Ffitch
Office of the Attorney General
Public Counsel
900 Fourth Avenue Suite 2000
Seattle, WA 98164



Nancy Maisano
WSBA #28632