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STATE OF WASH.  
UTIL. AND TRANSP.  
COMMISSION

BEFORE THE WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION

In the Matter of Application of the  
Application of Avista Corporation for  
Authority to Sell Its Interest In the Coal-  
Fired Centralia Power Plant.

DOCKET NO. UE-991255

PETITION TO INTERVENE

**1. Name and address of petitioner.**

International Union of Operating Engineers Local 612  
1555 Fawcett Avenue  
Tacoma, WA 98402

(253) 572-9612

**2. Name and address of the attorney, if any, representing the petitioner.**

Elizabeth Ford  
SCHWERIN CAMPBELL BARNARD LLP  
18 West Mercer Street, Ste. 400  
Seattle, WA 98119

(206) 285-2828

**3. If the petitioner is an organization:**

**a. State the number of members in the organization:**

Approximately 500 Operating Engineers employed by Centralia Mining  
Company (PacifiCorp) Centralia, WA.

ORIGINAL

- b. State the name of the person authorized to sign this petition for the organization:**

Gordon P. Howins, Business Manager–Financial Secretary

- c. Attach a copy of the document authorizing participation in this case or state the basis for the authorization.**

WAC 480 09 430 Intervention, General

- d. State the purpose of the organization:**

Representation of Workers at PacificCorps–Centralia Mining Company's operations.

- 4. The petitioner has participated in the following UTC cases in the last two years:**

<b>Date:</b>	<b>Docket No.:</b>	<b>Title of Proceedings:</b>
February, 1999	UE-981627	Application of PacifiCorp and Scottish Power

- 5. The petitioner has the following interest in this proceeding:**

The Petitioner has the interest of the protection and well-being of the community, the workforce and their families as a part of the community affected by the sale of Centralia Mining Company. No other entity can adequately represent the interests of Petitioner. We are concerned that the proposed application complies with the governing statutes of the State of Washington, and whether the sale is otherwise in the public interest.

- 6. The petitioner will raise the following issues in this case:**

Other than issues related to Petitioner's interest in the proceeding, we do not anticipate raising additional issues.



## SERVICE LIST

On this 22<sup>nd</sup> day of September, 1999, I caused the original Petition to Intervene on behalf of IUOE, Local 612 in the application of Avista Utilities to be hand-delivered 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:

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