

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,	)	Docket No. UE-060266
	)	
Complainant,	)	Docket No. UG-060267
	)	
vs.	)	
	)	PETITION FOR INTERVENTION
PUGET SOUND ENERGY, INC.,	)	
	)	
Respondent.	)	
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1           Seattle Steam Company (“Seattle Steam”) hereby moves to intervene in the above-captioned proceeding pursuant to WAC 480-09-430. In support of its petition, Seattle Steam states as follows:

2           1.       Seattle Steam purchases interruptible natural gas transportation service from Puget Sound Energy, Inc. (“PSE”) under PSE Schedule 57. Any changes to these tariff rates in Docket No. UG-060267 could substantially impact Seattle Steam’s business. Based on PSE’s prefiled testimony and exhibits, PSE is proposing to increase the annual cost of transporting 18 million therms (Seattle Steam’s historic usage) by some \$24,300 annually, through the imposition of a “depreciation tracker.” This is in spite of the fact that because Seattle Steam purchases interruptible transportation service, and its plant is located so that no new infrastructure has been installed to serve it for many years, all facilities utilized by Seattle Steam should have been long-since fully depreciated. Seattle Steam does not understand how this could be fair, just or reasonable.

3           2.       Since PSE has both electric and gas operations, there are many services which are shared between them such as meter reading, billing, purchasing, accounting and customer

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service. Thus, there may become a question of the proper allocation of the costs of any shared services to be recovered in electric and gas rates. Therefore, Seattle Steam requests permission to intervene in both dockets.

4           3.       At this time, Seattle Steam does not seek to modify or expand the issues before the Commission in this proceeding. Seattle Steam is not represented by any other party in this proceeding and intervention is necessary in order to adequately protect Seattle Steam's interests.

Seattle Steam's business address is:  
Seattle Steam Company  
1325 Fourth Avenue  
Suite 1440  
Seattle, Washington 98101

5           For Seattle Steam, copies of all pleadings, correspondence and documents filed in these proceedings should be sent to:

Robert B. Sheppard  
30 Glacier Key  
Bellevue, Washington 98006

6           The name and address of Seattle Steam's attorneys in this proceeding are:

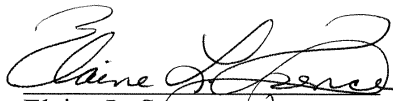
Elaine L. Spencer  
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7           4.       Seattle Steam reserves its right at this time to submit written testimony and exhibits, call witnesses, cross examine witnesses called by other parties and submit written arguments and/or motions.

8           WHEREFORE, Seattle Steam respectfully petitions the Commission for leave to intervene in this proceeding, and the right to participate in any hearings therein.

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GRAHAM & DUNN PC

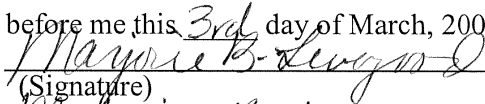
By   
Elaine L. Spencer

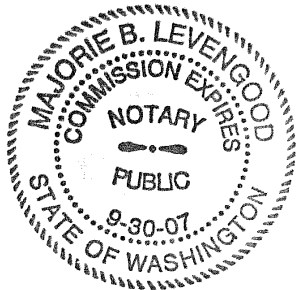
STATE OF WASHINGTON )  
                                      ) ss.  
COUNTY OF KING             )

I, Elaine L. Spencer, being first duly sworn on oath, depose and say:  
I am the attorney for Seattle Steam Company, Intervenor herein. I have read the foregoing  
Petition for Intervention and I hereby verify that the facts set forth therein are true to the best  
of my knowledge.

  
\_\_\_\_\_  
ELAINE L. SPENCER

SUBSCRIBED AND SWORN TO before me this 3rd day of March, 2006.

  
\_\_\_\_\_  
(Signature)  
Marjorie B. Levensood  
\_\_\_\_\_  
(Please print name legibly)



NOTARY PUBLIC in and for the State of  
Washington, residing at Seattle WA.  
My commission expires: 9/30/07.

**CERTIFICATE OF SERVICE**

I hereby certify that on this 3rd day of March, 2006, I served a copy of  
Petition for Intervention by mailing a copy of same via First Class Mail, postage prepaid, at  
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Seattle, King County, Washington, pursuant to WAC 480-07-150(6), to all parties listed

below who are on the official service list in Docket No. UE-060266 and UG-060267:

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EXECUTED this 3<sup>rd</sup> day of March, 2006, at Seattle, King County,  
Washington.

  
Loretta Galland  
Legal Secretary to Elaine L. Spencer

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