## **BEFORE THE**

## WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND	) DOCKET NO. UE-060266
TRANSPORTATION COMMISSION	)
Complainant,	) DOCKET NO. UG-060267
, ,	,
V.	)
PUGET SOUND ENERGY, INC.	) )
Respondent.	)

## PETITION TO INTERVENE OF COGENERATION COALITION OF WASHINGTON

- 1. Pursuant to WAC § 480-09-430, the Cogeneration Coalition of Washington (CCW)<sup>1</sup> petitions the Washington Utilities and Transportation Commission (Commission) for leave to intervene in the above-referenced docket, as an intervenor with full party status as described in WAC § 480-09-430(3).
- 2. Communications and correspondence regarding this proceeding shall be directed to:

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<sup>1</sup> CCW represents the cogeneration and customer interests of March Point Cogeneration Company, Sumas Energy Company and Tenaska Cogeneration.

3. CCW's members are all Qualifying Facilities. These generators are retail customers of PSE in that they purchase standby service as needed under PSE's Schedule 31. The application in this docket proposes substantial increases both in the energy charge and demand charge under Schedule 31. As customers, CCW's members are concerned about any increase in their rates, and whether such increase is justified by PSE's increased costs. CCW's members will have a direct and substantial interest in this rate filling.

4. Some of CCW's members responded to Puget's RFP, from which resources were selected that are included in the revenue requirement in this case.

These responders have an interest in the process by which the resources were selected, to ensure that the selection process was fair and nondiscriminatory, and that the most cost-effective resource was selected.

5. These represent direct and substantial interests which will not be adequately represented by any other party. CCW therefore requests leave to intervene in this matter, and to fully participate, including the right to offer evidence and to provide legal argument.

WHEREFORE, CCW respectfully petitions the Commission for leave to intervene in this proceeding with the full rights of a party.

Dated this 20<sup>th</sup> day of March, 2006.

Respectfully submitted,

Michael Alcantar Donald Brookhyser Alcantar & Kahl LLP 1300 SW Fifth Suite 1750 Portland OR 97210 503.402.9900 phone 503.402.8882 fax mpa@a-klaw.com deb@a-klaw.com Counsel to Cogeneration Coalition of Washington