## BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

Docket Nos. UE-090704 UG-090705

v.

PUGET SOUND ENERGY, INC.,

Respondent.

PETITION TO INTERVENE OF FEA

- I. The Secretary of Defense, through authorized counsel, hereby petitions the Washington Utilities and Transportation Commission to intervene in this proceeding on behalf of the consumer interest of the FEDERAL EXECUTIVE AGENCIES ("FEA").
- II. The name, title, mailing address, telephone number, and e-mail address of the person authorized to accept service of documents in this matter are:

Norman Furuta
Associate Counsel
Department of the Navy
1455 Market Street, Suite 1744
San Francisco, CA 94103-1399
TEL: (415) 503-6994; FAX: (415) 503-6688
e-mail: norman.furuta@navy.mil

III. The names, titles, mailing addresses, and telephone numbers of the persons to whom communication should be addressed are:

Kay Davoodi
ACQ-Utilities Rates and Studies Office
Naval Facilities Engineering Command-HQ
1322 Patterson Avenue, SE - Building #33
Washington Navy Yard, DC 20374-5018
TEL: (202) 685-3319; FAX: (202) 433-7159
e-mails: <a href="mailto:khojasteh.davoodi@navy.mil">khojasteh.davoodi@navy.mil</a> and
<a href="mailto:larry.r.allen@navy.mil">larry.r.allen@navy.mil</a>

and

Ralph Smith
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15728 Farmington Road
Livonia, MI 48154
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- IV. If the Commission should grant this Petition to Intervene, FEA shall waive service of process by means of personal delivery, United States mail, and parcel delivery service pursuant to WAC 480-07-150 (5) for all documents that are available in complete form by electronic means, provided that such documents are delivered electronically to the four (4) email addresses set forth in Paragraphs II and III of this Petition.
- V. FEA maintains military installations and civilian activities within the State of Washington that receive electrical service from Respondent. As a large user of electrical service provided by Respondent, the FEA has a significant interest in this proceeding and would be substantially affected by its outcome. No other party can adequately represent FEA's interest. FEA's participation can assist in the development of a sound

record and is not expected unduly to broaden the issues or delay the proceedings.

VI. FEA wishes to reserve the ability to submit written testimony and exhibits in hearing. FEA anticipates it will cross-examine witnesses called by other parties and submit written arguments and/or motions.

WHEREFORE, the FEDERAL EXECUTIVE AGENCIES seek leave to intervene and to be treated as a party to this proceeding.

Respectfully submitted,

DATED: June 16, 2009

NORMAN J. FURUTA Associate Counsel Department of the Navy

for the SECRETARY OF DEFENSE on behalf of the consumer interest of the FEDERAL EXECUTIVE AGENCIES

STATE OF CALIFORNIA

SS.

CITY AND COUNTY OF SAN FRANCISCO )

I, Norman J. Furuta, affirm that this petition is true and complete to the best of my knowledge and belief.

NORMAN J. FURUTA Associate Counsel Department of the Navy

for the SECRETARY OF DEFENSE on behalf of the consumer interest of the FEDERAL EXECUTIVE AGENCIES