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**STATE OF WASHINGTON
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

IN THE MATTER OF THE JOINT
APPLICATION OF

NO. U-180680

PUGET SOUND ENERGY, ALBERTA
INVESTMENT MANAGEMENT
CORPORATION, BRITISH COLUMBIA
INVESTMENT MANAGEMENT
CORPORATION, OMERS
ADMINISTRATION CORPORATION, AND
PGGM VERMOGENSBEHEER B.V.

**IBEW LOCAL 77 PETITION TO
INTERVENE**

FOR AN ORDER AUTHORIZING
PROPOSED SALES OF INDIRECT
INTERESTS IN PUGET SOUND ENERGY

BASIS FOR PETITION

1. Petitioner International Brotherhood of Electrical Workers, Local 77 (“IBEW Local 77”) moves to intervene under Washington Administrative Code (“WAC”) 480-07-355(1). Local 77 requests that the Utilities and Transportation Commission (“UTC”) permit intervention as a full party under WAC 480-07-340.

2. Petitioner IBEW Local 77 is located at the following address:

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2 IBEW Local 77
3 Louis R. Walter
4 Rex Habner
5 19415 International Blvd. South
6 SeaTac, WA 98188-5308
7 Phone: (206) 323-4505
8 Email: louwalter@ibew77.com
9 Email: rexhabner@ibew77.com

10 3. IBEW Local 77 is represented by Bradley Medlin. A separate Notice of
11 Appearance has been filed by IBEW Local 77's attorney in accordance with WAC 480-07-
12 345(2)(a). All documents related to this proceeding should be served upon IBEW Local 77's
13 attorney at the following address:

14 Bradley Medlin
15 Robblee Detwiler PLLP
16 2101 Fourth Avenue
17 Suite 1000
18 Seattle, WA 98121
19 Phone: (206) 467-6700
20 Email: bmedlin@unionattorneysnw.com

21 4. IBEW Local 77 was chartered in 1897 and has been an advocate for working men
22 and women in the Pacific Northwest for over 121 years. IBEW Local 77 is comprised of over
23 7,000 members in Washington, Idaho, and Montana. The organization is a member-run,
24 democratically elected, labor organization. IBEW members serve in various positions in the
25 electrical industry, including linemen, metermen, call center responders, relay operators, hydro
operators, tree trimmers, and many other classifications. Members work primarily in the
construction and utility industries.

5. IBEW Local 77 is the exclusive bargaining representative for eight hundred (800)
full-time, part-time, and temporary employees at Puget Sound Energy ("PSE"). These include
service lineman, equipment operators, relay technicians, meter technicians, system operators,

1 hydro electricians, hydro mechanics, environmental coordinators, cash clerks, customer
2 construction representatives, customer service representatives, and numerous others.

3 6. IBEW Local 77 and PSE have a collective bargaining agreement (“CBA”)
4 covering numerous employees who are directly involved in the daily operation, maintenance, and
5 customer assistance with PSE’s services to the public. The CBA between IBEW Local 77 and
6 PSE is effective through March 31, 2020. The CBA provides that IBEW Local 77 and PSE
7 share “a common interest in the electrical utility industry” and “the public” related to electrical
8 energy.

9 7. IBEW Local 77 also represents numerous workers employed by third-parties
10 which subcontract with PSE. These include workers who perform trenching, digging,
11 construction, tree removal, and other work necessary to ensure safe and effective electric utility
12 transmission. This includes, but is not limited to, work performed by Potleco Inc. and Asplund
13 Tree Expert.

14 8. IBEW Local 77 is committed to democracy in the workplace. Affording workers
15 a say in workplace outcomes challenges employees to perform at their best, maintain a vested
16 interest in successful outcomes, and meet professional goals. The proposed change in ownership
17 could lead to workplace changes for IBEW Local 77 members. No other entity is suited to
18 represent the interests of IBEW Local 77’s members working at PSE other than the union.

19 9. The proposed 43.99% transfer will substantially and directly affect IBEW Local
20 77’s eight hundred members who work at PSE. IBEW Local 77’s employees are the actual
21 persons who carry out PSE’s operations, targets, repair, safety, customer service, and UTC
22 commitments. The transfer of PSE’s interest to existing and new owners would substantially
23 affect these workers.
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1 10. IBEW Local 77 and its members possess information and knowledge that no other
2 party to this proceeding can provide. IBEW Local 77 can share information related to wages,
3 hours, safety standards, storm responsiveness, training, construction, staffing, service quality,
4 efficacy of customer service, and other key information related to PSE's 2008 Acquisition Order
5 commitments and general operation.

6 11. IBEW Local 77 has an interest in representing PSE employees related to wages,
7 hours, benefits, and other conditions of employment. IBEW 77 members' job satisfaction,
8 safety, health, overall compensation, and engagement directly impact PSE's customers and
9 ratepayers. IBEW Local 77 members directly interact with PSE's customers and ratepayers,
10 resolve safety issues, maintain critical infrastructure, respond to emergencies, and resolve
11 customer problems. The health and job satisfaction of IBEW Local 77 members directly relates
12 to the interaction with PSE customers and the public. Naturally, such issues have a direct impact
13 on PSE's customers and the public interest.

14 12. Pressures by new, and/or changed ownership in PSE, to reduce employee wages,
15 benefits, health coverage, pension benefits, and other remuneration will have a downstream
16 effect on PSE's 1.1 million electric and 825,000 natural gas customers. Unhealthy and/or
17 dissatisfied employees, or work in unsafe conditions, can negatively impact overall safety,
18 customer interaction, service quality, and responsiveness to PSE customers. Consequently, any
19 changes or pressure by new ownership could have a possible harm to the public interest.

20 13. PSE has vowed to honor its commitments in the 2008 Acquisition Order. These
21 include: staffing, management, and quality of service. IBEW Local 77's members have direct
22 knowledge about the effectiveness and implementation of these commitments. IBEW Local 77
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1 members are the individuals charged with actually carrying out and implementing these PSE-
2 UTC commitments.

3 14. PSE has similarly vowed to continue its accomplishments for a “company-wide
4 safety culture benefiting customers and employees.” IBEW Local 77 members have first-hand
5 experience and knowledge regarding the status of this goal. IBEW Local 77 members work
6 hand-in-hand with PSE management on safety practices, planning, implementation, and policy
7 review. Similarly, IBEW Local 77 members are often first-line responders to “storm events” –
8 where power transmission is interrupted by rain, wind, and/or severe weather. IBEW Local 77
9 members are utilized to ameliorate the consequences of “storm events,” make PSE’s
10 transmission safe, and protect the public. No other party is likely to focus on this issue.

11 15. PSE has proposed updating its 2008 Acquisition Order commitments to the UTC
12 and the public related to this transaction. These include commitments to its service quality
13 measures, to honor the labor contract, maintain its pension funding policy, provide sufficient
14 staffing and presence in the community, and ensure staffing at sufficient levels to support safe
15 and reliable services. IBEW Local 77 members are intimately involved with these updated
16 commitments which affect the public interest. IBEW Local 77 has a substantial interest in the
17 proceeding given these commitments directly affect its members’ jobs, health, safety, wages, and
18 welfare.
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20 16. Similarly, IBEW Local 77 has a substantial interest in any changes related to
21 PSE’s contracting with third-parties related to construction, underground trenching and/or other
22 utility work. IBEW Local 77 members currently perform construction and related utility work
23 on the PSE system. This work is covered by separate agreements with third-party contractors.
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1 IBEW Local 77 has a substantial interest in any decision by PSE and/or its ownership to make
2 changes to such contracting or assignment of work in the future.

3 17. For these reasons, IBEW Local 77 has a substantial interest in PSE's Joint
4 Application. No other party will represent these interests in the proceeding. IBEW Local 77's
5 intervention will not broaden the issues, burden the record, nor delay the proceeding. It is in the
6 public interest to permit the union to intervene.

7 18. IBEW Local 77 respectfully requests the UTC permit intervention in this
8 proceeding.

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10 DATED this 19th day of September, 2018.

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12 _____
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14 Robblee Detwiler PLLP
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16 Seattle, Washington 98121
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20 Attorneys for IBEW Local 77