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**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**In the Matter of the Joint Application of  
PUGET SOUND HOLDINGS, LLC and  
PUGET SOUND ENERGY, INC.  
For an Order Authorizing Proposed Transaction  
  
And  
WASHINGTON UTILITIES &  
TRANSPORTATION COMMISSION,  
  
Complainant,  
  
v.  
PUGET SOUND ENERGY, Inc.,  
  
Respondent.**

**DOCKET NO. U-072375  
DOCKET UE-072300  
DOCKET UG-072301  
  
PETITION TO INTERVENE OF  
WASHINGTON AND NORTHERN  
IDAHO DISTRICT COUNCIL OF  
LABORERS**

1 The Washington and Northern Idaho District Council of Laborers hereby petitions the WUTC  
2 for leave to intervene in the above-captioned proceedings pursuant to WAC 480-07-355. The address of  
3 petitioner is:

4 Washington and Northern Idaho District Council of Laborers  
5 P.O. Box 12917  
6 Mill Creek, Washington 98082-0917

7 The Washington and Northern Idaho District Council of Laborers will be represented by:

8 Dmitri Iglitzin  
9 Schwerin Campbell Barnard & Iglitzin  
10 18 West Mercer St., Suite 400  
11 Seattle, WA 98119

12 The petitioner's interest in this proceeding flows from the fact that it represents numerous  
13 individuals whose rates for gas and electricity provided by Puget Sound Electric, and whose ability to  
14 obtain those crucial services, may be impacted by these proceedings. Those individuals are not, as a  
15 practical matter, able to represent their own interests in this matter due to the fact that the impact on any  
16 one of these individuals likely falls below the threshold which would make it reasonable or feasible, as a  
17 practical matter, for that individual to bring this motion to intervene on his/her own individual behalf.

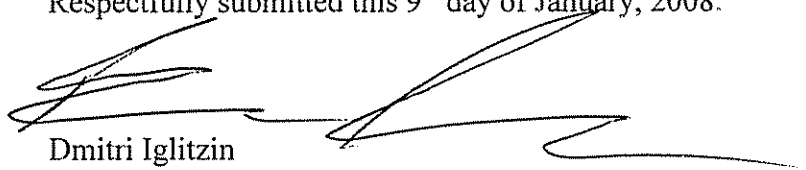
18 The petitioner's position with respect to the matters in controversy will be determined after all  
19 evidence has been presented.

20 The petitioner does not at this time believe that it will seek to broaden the issues that will  
21 otherwise be raised in this proceeding.

22 It is entirely within the Commission's discretion whether to grant or deny a petition to intervene.  
23 *Cole v. Washington Utilities & Transp. Comm'n.*, 79 Wn.2d 302, 305-07, 485 P.2d 71 (1971). See also  
*UE-951270, UE-960195; In re. Puget Sound Power & Light Company*, (Oct. 25, 1996), Tenth

1 Supplemental Order, citing RCW 34.05.443(3); WAC 480-09-430(3) and *Cole*. For the reasons outlined  
2 above, the Commission should allow the IBU's protest to go forward.

3 Respectfully submitted this 9<sup>th</sup> day of January, 2008.

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5 Dmitri Iglitzin  
6 Counsel for Petitioner

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1 CERTIFICATE OF SERVICE

2 I hereby certify that on January 9, 2007, I caused to be served the original and eighteen copies of  
3 the foregoing document to the following address via first class mail, postage prepaid to:

4 Carole Washburn, WUTC Executive Secretary  
5 Washington Utilities and Transportation Commission  
6 1300 S. Evergreen Park Drive SW  
7 P.O. Box 47250  
8 Olympia, WA 98504-7250

9 I certify that I have also provided to the Washington Utilities and Transportation Commission's  
10 Secretary an official electronic file containing the foregoing document via email to:

11 records@wutc.gov

12 I additionally caused to be served the foregoing document to the following individuals via first class  
13 mail, postage prepaid:

14 Perkins Coie  
15 Sheree Carson  
16 Jason Kuzma  
17 10885 N.E. Foruth Street Ste. 700  
18 Bellevue, WA 98004-5579

19 Boehm, Kurtz & Lowry  
20 Kurt J. Boehm  
21 Michael L. Kurtz  
22 36 E. Seventh St., Ste. 1410  
23 Cincinnati, OH 45202

Office of the Attorney General  
Simon Ffitch  
800 Fifth Avenue, Ste. 2000  
Seattle, WA 98104-3188

Federal Executive Agencies  
Norman J. Furuta  
333 Market St. Fl. 10 MS 1021A  
San Francisco, CA 94105-2195

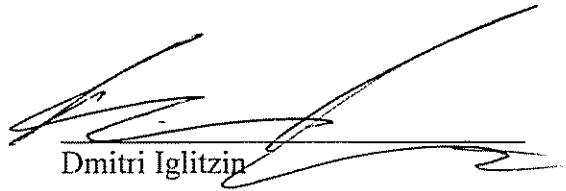
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Attorney General Office  
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1400 S. Evergreen Park Dr. SW  
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Ed Finklea/Chad Stokes  
1001 S.W. 5<sup>th</sup> Ste. 2000  
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Ronald Roseman  
2011 – 14<sup>th</sup> Avenue East  
Seattle, WA 98112

Dated this 9<sup>th</sup> day of January, 2008.



Dmitri Iglitzin