## **Portland General Electric Company**

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**Douglas C. Tingey** Associate General Counsel

March 10, 2020

State Of WASH
IIL. AND TRANSP
COMMISSION

VIA ELECTRONIC FILING

Mr. Mark L. Johnson Executive Director and Secretary Washington Utilities and Transportation Commission P.O. Box 47250 Olympia, WA 98504

Attn: Filing Center

Re: In the Matter of the Application of PUGET SOUND ENERGY, For an Order

Authorizing the Sale of All of Puget Sound Energy's Interests in Colstrip Unit 4 and Certain of Puget Sound Energy's Interests in the Colstrip Transmission System

**Docket UE-200115** 

Dear Mr. Johnson:

Enclosed for filing in the Docket No. UE-200115 is a Petition to Intervene of Portland General Electric Company.

If you have any questions regarding this filing, please contact me at (503) 464-8926.

Sincerely,

Douglas C. Tingey

DCT:hp
Enclosure

UE-200115-Pet-Int-3-10-20

Records Manager

# BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Application of

PUGET SOUND ENERGY,

1

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For an Order Authorizing the Sale of All of Puget Sound Energy's Interests in Colstrip Unit 4 and Certain of Puget Sound Energy's Interests in the Colstrip Transmission System **DOCKET UE-200115** 

PETITION TO INTERVENE OF PORTLAND GENERAL ELECTRIC COMPANY

Pursuant to WAC § 480-07-355, Portland General Electric Company ("PGE") submits this petition to intervene in this proceeding as an intervenor with full party status, as described in WAC § 480-07-340. The business address of PGE is:

Portland General Electric Company 121 SW Salmon Street Portland, OR 97204

All documents relating to this proceeding should be served on PGE's attorneys at the following address:

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PGE does not request paper service, unless required by WUTC rules or law.

The administrative rules at issue are WAC 480-07-340 and WAC 480-07-355.

3

PGE is a corporation created and organized under the laws of the State of Oregon with its headquarters located in Portland, Oregon. PGE is an investor-owned public utility company engaged in, among other things, the business of generating, transmitting, and distributing electric power to retail customers in Oregon.

4

PGE is a 20 percent owner in Colstrip Units 3 and 4 and is a party to the Ownership and Operation Agreement between and amongst the owners, which governs the ownership and operation of Colstrip Units 3 and 4. Similarly, PGE is an owner of the Colstrip Transmission System and is a party to the Colstrip Project Transmission Agreement, which governs the ownership and operation of the Colstrip Transmission System. PGE therefore has a substantial interest in Puget Sound Energy's ("PSE") proposed sale of its interest in Colstrip Unit 4 and certain of PSE's interests in the Colstrip Transmission System. PSE's sale of such interests could substantially and directly affect PGE and PGE's customers. PGE has not yet taken a position on the issues presented in PSE's Application in this proceeding; however, PGE is not proposing to broaden the issues in this proceeding. Accordingly, PGE requests leave to intervene in this proceeding.

5

As described above, PGE has a direct and substantial interest in this proceeding that will not be adequately represented by any other party, and may be affected by any Commission determination made in connection with this proceeding. PGE's participation will not unnecessarily broaden the issues or burden the record in this proceeding. Thus, it is in the public interest to allow PGE to intervene in this proceeding.

6 WHEREFORE, PGE respectfully petitions the Commission for leave to intervene in this

proceeding.

DATED this 10th day of March, 2020.

Respectfully submitted,

Douglas C. Tingey

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Portland, OR 97204

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Attorneys for Portland General Electric Company

#### CERTIFICATE OF SERVICE

## Service List Docket No. UE-200115

I hereby certify that on March 10, 2020, I served the **PETITION TO INTERVENE OF PORTLAND GENERAL ELECTRIC** upon all parties or party representatives of record in this proceeding, by electronic transmission to the email address(es) of each party or party representative listed on the commission's master service list for this docket.

## **Puget Sound Energy**

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DATED at Portland, Oregon, this 10th day of March, 2020.

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