BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Washington Utilities and Transportation)	
Commission,)	
Complainant,)	Docket NO. UE-011570
)	Docket NO. UG-01157
v.)	
)	
Puget Sound Energy, Inc.,)	
Respondent.)	

The NW Energy Coalition (NWEC) and Natural Resources Defense Council (NRDC) hereby request permission to co-intervene in the above referenced proceeding. In support of this Petition to Intervene, NWEC and NRDC assert the following:

A. NWEC's business address is:

NW Energy Coalition 219 First Ave. South Suite 100 Seattle, WA 98104

NRDC's business address is:

Natural Resources Defense Council 71 Stevenson Street Suite 1825 San Francisco, CA 94114

- B. NWEC and NRDC will be represented in this matter by Danielle Dixon, NW Energy Coalition Policy Associate. Danielle Dixon, NWEC and Ralph Cavanagh, NRDC are designated for service of all documents in this matter at the addresses of the organizational offices provided above.
- C. NWEC is a non-profit organization under section 501(c)(3) of the Internal Revenue Code. NWEC has approximately 200 individual members and 35 organizational members representing more than 300,000 citizens in Washington. NWEC's primary purpose is to promote an energy future that is clean, reliable, affordable, and equitable. Due to its historic and ongoing work with utility companies and others to achieve these goals, NWEC possesses unique interest in the outcome of this proceeding.

NRDC is a non-profit organization under section 501(c)(3) of the Internal Revenue Code. NRDC has more than 17,000 individual members in Washington, the majority of whom live in the Puget Sound

area. NRDC is dedicated to protecting natural resources and ensuring a safe and healthy environment. Due to its historic and ongoing work with utility companies and others to achieve these goals, NRDC possesses unique interest in the outcome of this proceeding.

- D. NWEC and NRDC have a special interest in this proceeding for the following reasons: (1) NWEC and NRDC members will be directly affected by rate changes and cost shifting among customer classes that may result from this proceeding; (2) rate design modifications that occur as a result of this proceeding may affect customer investment in energy efficiency; (3) decisions made in this proceeding may influence Puget Sound Energy's investments in energy conservation, renewable resources, and low-income energy services; and (4) decisions made regarding this proceeding may set a precedent for decisionmaking in future electric and gas rate cases.
- E. NWEC and NRDC intend to examine various issues in this proceeding, including but not limited to investments in energy efficiency and low income energy services, rate design, power cost adjustment, cost allocation, and electric resource portfolio.
- F. NWEC and NRDC offer this process considerable expertise in the area of resource planning, industry structure, and economic and policy analysis. NWEC and NRDC have participated in numerous rate cases, mergers, and resource planning proceedings in Oregon, Washington, Idaho, Montana and California.
- G. NWEC and NRDC have no intention of unreasonably broadening the issues, burdening the record or delaying the proceeding through their intervention.

For the foregoing reasons, NWEC and NRDC request the Commission grant their motion to cointervene in this matter.

December 17, 2001

Respectfully submitted,

Sara Patton, Coalition Director NW Energy Coalition 219 First Ave. South Suite 100 Seattle, WA 98104

CERTIFICATE OF SERVICE

I hereby certify that on this day, December 17, 2001, I have served a copy of the foregoing Motion to Intervene of the NW Energy Coalition and Natural Resources Defense Council by first class, U.S. Mail on the following persons:

Robert D. Cedarbaum Senior Counsel 1400 S. Evergreen Park Drive SW P.O. Box 40128 Olympia, WA 98504-0128

Shannon E. Smith Asst. Attorney General 1400 S. Evergreen Park Drive SW P.O. Box 40128 Olympia, WA 98504-0128

Simon ffitch Public Counsel Section Office of the Attorney General 900 Fourth Ave., Suite 2000 Seattle, WA 98164-1012

Markham A. Quehrn Kirstin S. Dodge William R. Mauer Attorneys at Law Perkins Coie LLP One Bellevue Center 411 108th Ave NE, Suite 1800 Bellevue, WA 98004-5584

Danielle O. Dixon	

December 17, 2001

Carole Washburn
Executive Secretary
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION
1400 So. Evergreen Park Drive SW
P.O. Box 47250
Olympia, WA 98504-7250

Re: Puget Sound Energy

Docket Nos. UE-011570 & UG-011571

Dear Ms. Washburn:

Attached for filing with the Commission please find an original plus fourteen (14) copies of the NW Energy Coalition's and Natural Resources Defense Council's petition to co-intervene in the above referenced proceeding. Because the Coalition operates on a Macintosh platform using MS Word, I e-mailed a copy of the petition to intervene to the Records Department rather than submitting a potentially unreadable disk copy.

Thank you for your assistance.

Sincerely,

Danielle Dixon Policy Associate NW Energy Coalition

Encl.

cc: all parties