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**BEFORE THE WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

In the Matter of:)	
)	
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION)	DOCKET NO. UE-011570
)	
Complainant,)	PETITION TO INTERVENE
)	OF KING COUNTY
PUGET SOUND ENERGY, INC.)	
)	
Respondent.)	

1. Name and address of petitioner.

King County Washington ("County"), by and through Don Theiler, Manager of the Wastewater Treatment Division, King County Department of Natural Resources, petitions the Washington Utilities and Transportation Commission ("WUTC" or "Commission") for leave to intervene in the above-referenced docket.

Don Theiler, Manager
King County Wastewater Treatment Division
KSC-NR-0501
201 South Jackson Street, 5th Floor
Seattle, WA 98104-1598

1
2 **2. Name and address of the attorney, representing the petitioner.**

3 Donald C. Woodworth, Senior Deputy Prosecuting Attorney

4 WSBA #4627

5 Tom Kuffel, Senior Deputy Prosecuting Attorney

6 WSBA #20118

7 900 King County Administration Building

8 500 Fourth Avenue

9 Seattle, WA 98104

10 Phone: (206) 296-0430

11 **3. Petitioner.**

12 King County is a home rule charter county under Article 11 § 4 (amendment 21) and was
13 established pursuant to Title 36 of the Revised Code of Washington. Don Theiler is authorized
14 to sign this petition by virtue of his position as Manager of the Wastewater Treatment Division
15 of the King County Department of Natural Resources, a manager reporting to Pam Bissonnette,
16 Director of King County Department of Natural Resources.

17 **4. The petitioner has participated in the following UTC cases in the last two years:**

18 a. Air Liquide America Corporation et al. v. PSE, Inc., Docket No. UE-001952;

19 b. In re: Petition of Puget Sound Energy, Inc. for an Order Reallocating Lost

20 Revenues Related to any Reduction in the Schedule 48 or G-P Special Contract Rates, Docket
21 No. UE-001959; and

22 c. In the matter of the Petition of Puget Sound Energy, Inc., for An Order

23 Authorizing Deferral of Certain Electric Energy Supply Costs, Docket No. UE-011170.

1 **5. Petitioner Interest:**

2 King County has the following substantial interest in this proceeding:

3 a. King County is a local county government. Its interest is to protect King County
4 taxpayers and sewage ratepayers.

5 b. King County is currently a customer of Puget Sound Energy, Inc. ("Puget" or
6 "PSE") under a special contract for electricity used in its South Wastewater Treatment Plant in
7 Renton, Washington and under several other tariff rate schedules at its other facilities.

8 c. King County desires to participate in this proceeding to:

9 * Review and consider the application and effect of Puget Sound Energy's
10 petition on King County.

11 * Represent and protect the interests of its residents, taxpayers and
12 wastewater treatment rate payers.

13 * Represent its own commercial interests in receiving safe, adequate,
14 reliable and efficient service at just, fair, reasonable and sufficient prices.

15
16 **6. The petitioner will raise the following issues in this case:**

17 a. Whether the petitioner's proposed general and interim rate revisions are fair, just,
18 reasonable and sufficient and in the interests of the residents and ratepayers of King County.

19 b. Whether the petitioner's current rates on file and in effect with the Commission,
20 including rates paid by King County under its Special Contract with Puget Sound Energy, Inc.,
21 are fair, just, reasonable and in the interest of the residents and ratepayers of King County.

22 c. Whether the petitioner's rate charged of King County pursuant to Schedule 48
23 was fair, just, reasonable and in the interest of the residents and ratepayers of King County.

