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January 4, 2002

BY FACSIMILE TO (360) 586-1150 AND BY FEDERAL EXPRESS MONDAY
DELIVERY (Airbill # 8306-3248-5831)

Ms. Carole Washburn, Executive Secretary
Washington Utilities and Transportation Commission
Chandler Plaza Building
1300 S. Evergreen Park Drive SW
Olympia, Washington 98504

Re: Puget Sound Power & Light General Rate Case
Washington Utilities & Transportation Commission
Docket Nos. UE-011570 and UG-011571

Dear Ms. Washburn:

Enclosed please find the original and nineteen copies of the Petition for Late Intervention on behalf of the consumer interest of the Federal Executive Agencies in the matter referenced above.

Please call me at (650) 746-7312 if you have any questions.

Yours truly,

NORMAN J. FURUTA
Associate Counsel
(Regulatory Law)

copy by e-mail to: records@wutc.wa.gov

Enclosures: as stated

BEFORE THE WASHINGTON UTILITIES
AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENTERGY, INC.,

Respondent.

Docket Nos. UE-011570
UG-011571

PETITION FOR LATE
INTERVENTION

I. The Secretary of Defense, through authorized counsel, hereby petitions the Washington Utilities and Transportation Commission for late intervention in this proceeding on behalf of the consumer interest of the FEDERAL EXECUTIVE AGENCIES ("FEA").

II. The names, titles, mailing addresses, and telephone numbers of the persons authorized to accept service of papers in this matter and to whom communication should be addressed are:

Norman Furuta
Associate Counsel
Department of the Navy
2001 Junipero Serra Blvd., Suite 600
Daly City, CA 94014-1976
TEL: (650) 746-7312; FAX: (650) 746-7372
e-mail: FurutaNJ@efawest.navfac.navy.mil

and

Kay Davoodi
Rate Intervention
Naval Facilities Engineering Command

1314 Harwood Street SE
Washington Navy Yard, DC 20374-5018
TEL: (202) 685-3319; FAX: (202) 433-7159
e-mail: DavoodiKR@efaches.navfac.navy.mil

and

Maurice Brubaker
Brubaker and Associates, Inc.
1215 Fern Ridge Parkway, Suite 208
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FAX: (314) 275-7036
e-mail: mbrubaker@consultbai.com

III. The undersigned has not participated on behalf of FEA or any other party in any UTC cases in the last two years.

IV. FEA maintains military installations and civilian activities within the State of Washington which receive electrical service from Respondent. As a large user of electrical service provided by Respondent, the FEA has a significant interest in this proceeding and would be substantially affected by its outcome. FEA's participation can assist in the development of a sound record and is not expected unduly to broaden the issues or delay the proceedings.

V. Among the issues FEA expects to raise in these proceedings is the appropriate amount of interest to be returned to ratepayers in the event the Commission orders refunds of rates authorized in the interim phase. FEA expects to raise other issues as the discovery process progresses.

VI. FEA intends to submit written testimony and exhibits of the following people, who will also testify in hearing:

Maurice Brubaker

John B. Legler

FEA anticipates it will cross-examine witnesses called by other parties and submit written arguments and/or motions.

VII. On December 6, 2001, the undersigned submitted an e-mail message to the Commission in accordance with directions on the Commission's website to be included on the interested party list for the Puget Sound Energy Rate Increase proceedings (UE-011570 and UG-011571) (see Attachment "A"). However, to this date no notice of any kind regarding these proceedings has been sent to the e-mail addresses set forth in Attachment "A."

Furthermore, the service list attached to the Application of Puget Sound Energy in this proceeding contains the following entry for the undersigned:

Norman J. Furuta
Department of the Navy
Representing Industrial Customers of NW
900 Commodore Drive
1300 SW Fifth Avenue, Suite 2915
Portland, OR 97201

The address and party designation are incorrect and apparently resulted from combining information from different parties' addresses from a service list of a previous proceeding. (The undersigned has never represented "Industrial Customers of NW"

and has never resided in Oregon.)

The service list attached to Puget Sound Energy's Application also contains an outdated address for our Washington DC Rate Intervention Office. However, the Rate Intervention Office has not been receiving any mail through the United States Postal Service since early November 2001 due to the discovery of anthrax contamination at postal distribution facilities in the Washington DC area, and it is uncertain at this time when mail delivery service will be restored to that office.

As a result of these unusual occurrences all of which were beyond its control, FEA was not made aware of the deadline for filing a Petition to Intervene until after that deadline had passed. FEA asserts that granting this petition for late intervention under these circumstances will not prejudice any party to this proceeding.

VII. If this Petition for Late Intervention is granted, FEA requests that parties serve all documents electronically as well as by hard copy due to the current suspension of mail delivery by the United States Postal Service to the Washington DC Rate Intervention Office.

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WHEREFORE, the FEDERAL EXECUTIVE AGENCIES seek leave to intervene and to be treated as a party to this proceeding.

Respectfully submitted,

DATED: _____ NORMAN J. FURUTA
Associate Counsel
Department of the Navy

for the SECRETARY OF DEFENSE
on behalf of the consumer
interest of the FEDERAL
EXECUTIVE AGENCIES

STATE OF CALIFORNIA)
) SS.
SAN MATEO COUNTY)

I, Norman J. Furuta, affirm that this petition is true and complete to the best of my knowledge and belief.

NORMAN J. FURUTA
Associate Counsel
Department of the Navy

for the SECRETARY OF DEFENSE
on behalf of the consumer
interest of the FEDERAL
EXECUTIVE AGENCIES

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY, INC.,

Respondent.

Docket Nos. UE-011570
UG-011571

PETITION FOR LATE
INTERVENTION

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this date I caused to be served the foregoing Petition for Late Intervention with attachment and cover letter by mailing with postage prepaid to the following:

Markham Quehrn and Kirstin
Dodge
Perkins Coie LLP
One Bellevue Center, Suite
1800

Danielle Dixon
NW Energy Coalition
219 First Avenue, STE 100
Seattle, WA 98104

Don Brookhyser/Elizabeth
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1300 SW Fifth AV, STE 1750
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S. Bradley Van Cleve
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Ms. Carole Washburn, Exec. Secreta
WA Utilities and Transportation
Comm.
Chandler Plaza Building
1300 S. Evergreen Park Drive SW

I declare under penalty of perjury under the laws of the
State of California that the foregoing is true and correct.

Dated this 4th day of January 2002 in Daly City, California.

Leticia G. Byrd