## BRICKFIELD BURCHETTE RITTS & STONE, PC

WASHINGTON, D.C. AUSTIN, TEXAS

July 23, 2009

# VIA ELECTRONIC SUBMISSION & FEDERAL EXPRESS

Mr. David Danner Executive Director & Secretary Washington Utilities and Transportation Commission 1300 S. Evergreen Park Drive, S.W. Olympia, Washington 98504-7250

Re: WUTC v. Puget Sound Energy

Docket Nos. UE-090704/UG-090705 (consolidated)

Dear Mr. Danner:

Please find enclosed the originals and sixteen (16) copies of the *Petition to Intervene of Nucor Steel Seattle, Inc.* in the above-referenced proceeding.

An electronic copy of this filing will be provided to the Records Center and all parties listed on the current service list. Please contact the undersigned if you have any questions or concerns regarding this matter.

Sincerely,

Damon E. Xenopoulos, Esq.

Glenopoulos

Peter G. Haller, Esq.

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Enclosure

cc: Service List

#### **BEFORE THE**

### WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND	) DOCKET UE-090704
TRANSPORTATION COMMISSION,	)
	) DOCKET UG-090705
Complainant,	) (consolidated)
	)
v.	) PETITION TO INTERVENE OF NUCOR
	) STEEL SEATTLE, INC.
PUGET SOUND ENERGY, INC.,	)
D 1 /	)
Respondent.	)
	)

Pursuant to WAC § 480-07-355, Nucor Steel Seattle, Inc. ("Nucor") hereby moves for leave to intervene in the above-referenced proceeding before the Washington Utilities and Transportation Commission ("Commission"). In support of this Motion, Nucor states as follows:

- 1. On May 8, 2009, Puget Sound Energy, Inc. ("PSE") filed an application with the Commission for an order authorizing a general increase in its rates for natural gas service.
- 2. Nucor owns and operates a steel mill in Seattle, Washington, and takes gas transportation service from PSE. Nucor's full name and primary place of business is:

Nucor Steel Seattle, Inc. 2424 SW Andover Seattle, Washington 98106-1100

- 3. As a major transportation customer of PSE, Nucor has a direct interest in these proceedings, and the outcome may have a substantial and direct effect on Nucor. Nucor has not yet determined what, if any, positions it will take on any issues raised, nor what relief it may seek to protect its interests.
  - 4. Nucor's intervention in this proceeding will not broaden the issues.

5. The following persons should be included on the service list in these proceedings, and all communications concerning this matter should be addressed to:

Damon E. Xenopoulos, Esq. Shaun C. Mohler, Esq. Peter. G. Haller, Esq. Brickfield, Burchette, Ritts & Stone, PC 1025 Thomas Jefferson St., NW Eighth Floor-West Tower Washington, DC 20007 Telephone: 202-342-0800 Facsimile: 202-342-0807 dex@bbrslaw.com shaun.mohler@bbrslaw.com peter.haller@bbrslaw.com

WHEREFORE, Nucor respectfully petitions the Commission for leave to participate in this proceeding with full rights as a party.

DATED this 23<sup>th</sup> day of July, 2009.

Respectfully submitted,

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Attorneys for Nucor Steel Seattle, Inc.

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served via e-mail and/or first class mail this 23<sup>th</sup> day of July 2009, to the following:

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