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**STATE OF WASHINGTON  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

IN THE MATTER OF THE JOINT  
APPLICATION OF

NO. U-180680

PUGET SOUND ENERGY, ALBERTA  
INVESTMENT MANAGEMENT  
CORPORATION, BRITISH COLUMBIA  
INVESTMENT MANAGEMENT  
CORPORATION, OMERS  
ADMINISTRATION CORPORATION, AND  
PGGM VERMOGENSBEHEER B.V.

**UNITED ASSOCIATION LOCAL 32 OF  
PLUMBERS AND PIPEFITTERS  
PETITION TO INTERVENE**

FOR AN ORDER AUTHORIZING  
PROPOSED SALES OF INDIRECT  
INTERESTS IN PUGET SOUND ENERGY

**BASIS FOR PETITION**

1. Petitioner United Association Local 32 of Journeymen and Apprentices of the Plumbing and Pipefitting Industry of the U.S. and Canada (“Local 32”) moves to intervene under Washington Administrative Code (“WAC”) 480-07-355(1). Local 32 requests that the Utilities and Transportation Commission (“UTC”) permit intervention as a full party under WAC 480-07-340.

2. Petitioner Local 32 is located at the following address:

UNITED ASSOCIATION LOCAL 32  
PETITION TO INTERVENE  
(No. U-180680) - 1

Robblee Detwiler PLLP  
ATTORNEYS at LAW  

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2101 FOURTH AVENUE, SUITE 1000  
SEATTLE, WA 98121  
(206) 467.6700 · FAX (206) 467-7589

1 United Association Local 32  
2 Jeff Owen  
3 Kurt Swanson  
4 595 Monster Road S.W.  
5 Suite 213  
6 Renton, WA 98057  
7 Email: [jeff@ualocal32.com](mailto:jeff@ualocal32.com)  
8 Email: [kurt@ualocal32.com](mailto:kurt@ualocal32.com)

9 3. Local 32 is represented by Bradley Medlin. A separate Notice of Appearance has  
10 been filed by Local 32's attorney in accordance with WAC 480-07-345(2)(a). All documents  
11 related to this proceeding should be served upon Local 32's attorney at the following address:

12 Bradley Medlin  
13 Robblee Detwiler PLLP  
14 2101 Fourth Avenue  
15 Suite 1000  
16 Seattle, WA 98121  
17 Phone: (206) 467-6700  
18 Email: [bmedlin@unionattorneysnw.com](mailto:bmedlin@unionattorneysnw.com)

19 4. Local 32 was chartered in August 1889 by the United Association of Journeyman  
20 and Apprentices of the Plumbing and Pipefitting Industry of the United States and Canada.  
21 Since then – for over 129 years – Local 32 has been committed to improving the lives of working  
22 men and women in the pipe trades. The union is a democratically elected labor organization  
23 with nearly 4,000 members. Local 32 members work in various crafts, including: plumbers,  
24 pipefitters, HVAC, and gas distribution. Union members work in the construction, utilities,  
25 metal trades, and marine/shipyard industries.

5. Local 32, in partnership with United Association of Journeymen and Apprentices  
of the Plumbing and Pipefitting Industry, Local 26 (“Local 26”), represent over two hundred and  
sixty (260) full-time, part-time, and temporary employees at Puget Sound Energy (“PSE”).  
These include: pressure control technicians, inspectors, CFS techs, dispatchers, gas workers,

1 utility workers, gas storage technicians, gas fitters, and numerous others. These employees are  
2 the primary workers who maintain, service, and operate PSE's gas infrastructure.

3 6. Local 32 (with Local 26) and PSE have a collective bargaining agreement  
4 ("CBA") covering employees directly involved in daily operation, maintenance, and customer  
5 assistance for gas services. The CBA between Local 32 and PSE is effective from December  
6 2017 through September 2021. The CBA provides that the "Company and the Union share a  
7 common interest in developing a flexible and skilled workforce" and that the "public is entitled  
8 to receive safe, adequate and convenient service at reasonable rates." Local 32 and its members'  
9 work plays an important role in serving the public interest for gas distribution.

10 7. Currently, over one hundred seventy (170) Local 32 members are separately  
11 employed by various subcontractors who perform gas-related services for PSE. These  
12 subcontractors contract with PSE to install gas lines, provide new gas service, and perform other  
13 utility work. This includes work performed by InfraSource. These union members perform  
14 essential work that is necessary to maintain gas line transmission and distribution which serves  
15 the public interest.

16 8. Local 32 is committed to democracy in the workplace. When union members  
17 have a voice, it challenges them to be their best because they have a vested interest in their job.  
18 The Union's members take pride in being professional, productive, and dedicated to their crafts.  
19 The proposed 43.99% transfer will substantially and directly affect Local 32 members at PSE  
20 and could affect their workplace.

21 9. PSE's proposed 43.99% transfer will substantially and directly affect Local 32's  
22 members. Local 32 members are the persons charged with carrying out PSE's operations,  
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1 including the critical maintenance of gas infrastructure. The transfer of PSE's interest to new  
2 and existing owners would substantially affect these workers.

3 10. Local 32, and its members, possess information and knowledge that no other party  
4 to this proceeding can furnish. Local 32 members are the individuals who construct, maintain,  
5 and repair PSE's gas lines. They are also the individuals charged with responding to customer  
6 "gas odor" calls, "broken and blowing" situations, and other emergencies. The union members  
7 can share critical information and observations related to maintenance of the gas lines, wages,  
8 hours, safety standards, flood/earthquake responsiveness, training, construction, staffing, service  
9 quality, efficacy of customer service, and other key information related to PSE's 2008  
10 Acquisition Order commitments and general operation.

11 11. Local 32 has an interest in representing PSE employees related to wages, hours,  
12 benefits, and other conditions of employment. Local 32 members' job satisfaction, safety,  
13 health, overall compensation, and engagement directly impact PSE's customers and ratepayers.  
14 Local 32 members directly interact with PSE's customers and ratepayers, resolve safety issues,  
15 maintain critical infrastructure, respond to gas emergencies, and troubleshoot customer  
16 problems. The health, safety, and job satisfaction of Local 32 members directly relates to the  
17 interaction with PSE customers and the public. Naturally, such issues have a direct impact on  
18 PSE's customers and the public interest.

19 12. Pressures by new and/or changed ownership in PSE, to reduce employee wages,  
20 benefits, health coverage, pension benefits, and other remuneration will have a downstream  
21 effect on PSE's 825,000 natural gas customers. Unhealthy and/or dissatisfied employees or  
22 work in unsafe conditions can negatively impact overall safety, customer interaction, service  
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1 quality, and responsiveness to PSE customers. Consequently, any changes or pressure by new  
2 ownership could have a possible harm to the public interest.

3 13. PSE has vowed to honor its commitments in the 2008 Acquisition Order. These  
4 include: staffing, management, and quality of service. Local 32's members have direct  
5 knowledge about the effectiveness and implementation of these commitments. Local 32  
6 members are the individuals charged with actually carrying out and implementing these PSE-  
7 UTC requirements.

8 14. PSE has similarly vowed to continue its accomplishments for a "company-wide  
9 safety culture benefiting customers and employees." Local 32 members are intimately involved  
10 in carrying out this requirement. Local 32 members are tasked with responding to gas  
11 emergencies. They are the ones entrusted with first response to gas odors, broken lines and  
12 meters, and other gas infrastructure. Likewise, Local 32 members are first-line responders to  
13 floods, fires, and earthquakes. During these natural disasters, gas lines have to be secured,  
14 meters deactivated, and service restored following strict protocols. No other party is likely to  
15 focus on this issue.  
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17 15. Recent events in Andover, Massachusetts, with NiSource's (dba Columbia Gas)  
18 system failure, illustrates the importance of maintaining gas infrastructure and safety protocols.  
19 Local 32's members are the persons tasked with installing and operating PSE's system. They  
20 take great care in ensuring the safety of PSE's customers. Accordingly, the Union possesses  
21 information on this issue that no other party is likely to provide, which affects the public interest.  
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23 16. PSE has proposed updating its 2008 Acquisition Order commitments to the UTC  
24 and the public related to this transaction. These include commitments to its service quality  
25 measures, to honor the labor contract, maintain its pension funding policy, provide sufficient

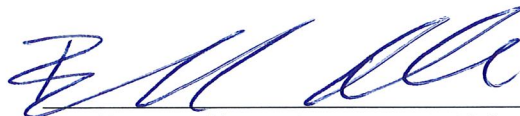
1 staffing and presence in the community, and ensure staffing at sufficient levels to support safe  
2 and reliable services. Local 32 members are closely involved with these updated commitments  
3 which affect the public interest. Local 32 has a substantial interest in the proceeding given these  
4 commitments directly affect its members' jobs, health, safety, wages, and welfare.

5 17. Similarly, Local 32 has a substantial interest in any changes regarding PSE's  
6 contracting with third-parties for main installation, trenching, gas fitting, piping, and other utility  
7 work. Local 32 members currently perform construction and gas fitting for PSE. This work is  
8 covered by separate agreements with third-party contractors. Local 32 has a substantial interest  
9 in any decision by PSE and/or its ownership to change such contracting or assignment of work in  
10 the future.

11 18. For these reasons, Local 32 has a substantial interest in PSE's Joint Application.  
12 No other party will represent these interests in the proceeding. Importantly, Local 32's  
13 intervention will not broaden the issues, burden the record, nor delay the proceeding. It is in the  
14 public interest to permit the union to intervene.

15 19. Local 32 respectfully requests the UTC permit intervention in this proceeding.

16 DATED this 20th day of September, 2018.

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