

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Application of)	DOCKET UE-200115
)	
PUGET SOUND ENERGY)	
)	LATE-FILED PETITION TO
For an Order Authorizing the Sale of All of)	INTERVENE OF MICROSOFT
Puget Sound Energy’s Interests in Colstrip)	CORPORATION
Unit 4 and Certain of Puget Sound Energy’s)	
Interests in the Colstrip Transmission)	
System.)	
_____)	

1 Pursuant to WAC § 480-07-355, Microsoft Corporation (“Microsoft”) hereby petitions the Washington Utilities and Transportation Commission (“WUTC” or “Commission”) for leave to intervene in the above-referenced docket as an intervenor with full party status, as described in WAC § 480-07-340. This Late-Filed Petition to Intervene is made pursuant to WAC § 480-07-355(1)(b) and for good cause, as set forth more fully herein. The business address for Microsoft is:

Microsoft Corporation
Attn: Jim Stanton, Senior Community Affairs Manager, AICP
Microsoft Real Estate & Facilities
One Microsoft Way
Redmond, WA 98052

2 Microsoft will be represented in this proceeding by Davison Van Cleve, P.C (“DVC”). All documents relating to this proceeding should be served on Microsoft’s attorney at the following address:

Tyler C. Pepple
Davison Van Cleve, P.C.
1750 SW Harbor Way, Suite 450
Portland, OR 97201
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Telephone: (503) 241-7242
Attorney for Microsoft

Microsoft does not request paper service, unless required by WUTC rules or law. If permitted by the presiding officer, Microsoft also requests that electronic service be provided to the following:

Jesse O. Gorsuch
jog@dvclaw.com
Paralegal for DVC

3 The administrative rules at issue are WAC § 480-07-340, -355.

4 On February 19, 2020, PSE filed an application that seeks a Commission order authorizing the sale of PSE's interests in Colstrip Unit 4 and the Colstrip Transmission System, as well as approval of a power purchase agreement with NorthWestern Energy (the "Proposed Transactions"). Microsoft takes delivery service from PSE pursuant to a special contract the Commission approved in Docket No. UE-161123. The Commission-approved stipulation in that docket reserves for other proceedings a determination of Microsoft's potential obligation to contribute to decommissioning and remediation costs associated with PSE's interest in Colstrip.^{1/} The Proposed Transactions under review in this proceeding define the scope of PSE's decommissioning and remediation cost responsibility for Colstrip Unit 4. Accordingly, the Proposed Transactions, if approved, may have a direct and substantial impact on the amount of decommissioning and remediation costs ultimately allocated to Microsoft.

^{1/} Docket No. UE-161123, Order 06, Appen. A ¶ 11 (July 13, 2017).

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The Commission convened a prehearing conference in this docket on March 13, 2020. Pursuant to WAC § 480-07-355(1)(a), the deadline to intervene in this proceeding was three days earlier than the prehearing conference for this matter. Pursuant to WAC § 480-07-355(1)(b), Microsoft has good cause for making a late-filed petition to intervene. Microsoft's substantial interest in this proceeding, discussed above, was not readily apparent from PSE's filing. The potential implications of the Proposed Transactions on Microsoft's ultimate responsibility for decommissioning and remediation costs associated with Colstrip required investigation of the transaction documents and the net benefit analyses PSE performed when evaluating whether to enter into the Proposed Transactions. Microsoft has requested to intervene in this docket prior to the filing of responsive testimony in this case, and Microsoft accepts the procedural schedule adopted in Order 02 in this docket. Therefore, Microsoft's intervention will not unduly delay this proceeding, nor does Microsoft seek to broaden the issues in this proceeding. Finally, Microsoft has contacted PSE, Commission Staff, and Public Counsel, and none of these parties objects to Microsoft's intervention.

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As described above, Microsoft has a direct and substantial interest in this proceeding that will not be adequately represented by any other party, and may be affected by any Commission determination made in connection with this proceeding. Thus, it is in the public interest to allow Microsoft to intervene in this proceeding.

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WHEREFORE, Microsoft respectfully petitions the Commission for leave to intervene in this proceeding.

Dated this 30th day of April, 2020.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

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