

1 **BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION**
2 **COMMISSION**

3 WASHINGTON UTILITIES AND
4 TRANSPORTATION COMMISSION,

5 Complainant,

6 v.

7 PUGET SOUND ENERGY, INC.,

8 Respondent.

Docket Nos. UE-011570 and
UG-011571 (consolidated)

PETITION FOR INTERVENTION
OF WORLDCOM, INC.

9 Pursuant to WAC 480-09-430, WorldCom, Inc. ("WorldCom") hereby petitions the
10 Washington Utilities and Transportation Commission ("Commission") for leave to intervene in
11 the above-entitled docket. As ground for this intervention, WorldCom states as follows:

12 **I. CONTACT INFORMATION**

13 All communications with WorldCom should be directed to the following persons:

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21 **II. BACKGROUND INFORMATION**

22 WorldCom is a Delaware corporation, with its principle place of business at
23 707 - 17th Avenue, Suite 4200, Denver, Colorado 80202. WorldCom is authorized to provide
24 telecommunications services, and maintains facilities in the State of Washington.

25 **III. INTEREST IN PROCEEDING**

26 As a member of the class of customers which had Special Contracts approved by this
Commission in Docket No. UE-010525, WorldCom will have a direct and immediate interest in
the subject matters involved in the general rate phase of this docket. As the Commission is

1 aware, the rates under which WorldCom receives electric service from Puget Sound Energy
2 (PSE) will expire at the conclusion of this case; consequently, the issues to be addressed in the
3 general rate phase of this docket will have a direct and material impact on WorldCom's ability to
4 provide its services competitively to consumers in the State of Washington. WorldCom is
5 interested in this matter with regard to its Internet data facility and is interested in the rates that
6 will apply to the facility at the conclusion of this case. Indeed, WorldCom and the other
7 customers in Docket No. UE-010525 clearly evidenced their intention to participate in PSE's
8 next general rate case by preserving such a right in the language of the settlement documents, as
9 well as in their comments at the hearing convened to consider the settlement (Settlement
10 Conference dated October 17, 2001; *Tr.* at pages 135-137).

11 **IV. SCOPE OF PARTICIPATION**

12 WorldCom's intervention will not unreasonably broaden the issues, burden the record or
13 unreasonably delay the proceedings. As noted above, WorldCom is interested in participating in
14 the general rate phase of this matter that is not scheduled to begin until April, 2002. *See*
15 Appendix Three to Fourth Supplemental Order in Docket No. UE-011570 and No. UG-011571
16 (consolidated). WorldCom has no interest in the interim rate phase of this docket. Given the
17 current schedule of the general rate phase of this case, no party is prejudiced by the Commission
18 granting this late-filed intervention. WorldCom accepts the record in this matter, including the
19 procedures and schedules now in place.

20 **V. REASON FOR DELAY IN FILING**

21 WorldCom was unable to complete its internal management processes regarding the
22 consideration of intervening into this matter until very recently. WorldCom was aware of the
23 possibility that it may have to file out of time because of these circumstances and provided notice
24 to the Commission and other parties at the prehearing conference in this matter that was held on
25 December 20, 2001. At the prehearing conference, John A. Cameron, attorney for AT&T
26 Wireless, stated in the record that he was asked by inside counsel for WorldCom to inform the

1 Commission that: (1) WorldCom had not been able to complete its internal process before the
2 date of the Prehearing Conference; and (2) WorldCom expected to intervene in this matter
3 (Pre-hearing Conference dated December 20, 2001; *Tr.* at page 7, lines 9-16). WorldCom
4 provided as much notice regarding its intention to intervene that it could under the
5 circumstances. While the undersigned counsel for WorldCom believes that under the
6 circumstances at hand (*i.e.*, the general rate phase will not begin until April), no party will be
7 prejudiced by the Commission granting this intervention, counsel has advised management of the
8 importance of maintaining the normal process in such matters.

9 **VI. RELIEF REQUESTED**

10 WorldCom respectfully requests leave to intervene as a full party in this proceeding, with
11 a right of discovery, to have notice of and appear at the taking of testimony, to produce and
12 cross-examine witnesses, and to be heard in person or by counsel on brief and at oral argument.

13
14 RESPECTFULLY SUBMITTED this 21st day of February, 2002.

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16 **ATER WYNNE LLP**

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27 ATTORNEYS FOR WORLD COM, INC.