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BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY, INC.,

Respondent.

Docket Nos. UE – 011570 and
UG – 011571
(Consolidated)

PETITION TO INTERVENE AND
PROTEST OF CITIES OF BELLEVUE
AND MAPLE VALLEY

1. Names and addresses of petitioners:

CITY OF BELLEVUE
c/o Lori Molander Riordan
Supervising Attorney
City Attorney's Office
11511 Main Street
P.O. Box 90012
Bellevue, WA 98009-9012
Business: (425) 452-6829
Fax: (425) 452-7256

CITY OF MAPLE VALLEY
c/o John Starbard
City Manager
22035 S.E. Wax Road
P.O. Box 320
Maple Valley, WA 98038
Business: (425) 413-8800
Fax: (425) 413-4282

1 **2. Name and address of attorney representing petitioners:**

2 Carol S. Arnold
3 Laura K. Clinton
4 Preston Gates & Ellis LLP
5 701 Fifth Avenue, Suite 5000
6 Seattle, WA 98104-7078
7 Business: (206) 623-7580
8 Fax: (206) 623-7022

7 **3. Identity of petitioners:**

8 The Cities of Bellevue and Maple Valley (“Petitioner Cities”) are political subdivisions of
9 the State of Washington.

10 **4. Petitioners’ interest in this proceeding:**

11 The Cities of Bellevue and Maple Valley wish to join the Cities of Auburn, Des Moines,
12 Federal Way, Redmond, Renton, SeaTac, and Tukwila (“Cities”) as Intervenors in this proceeding.

13 **5. Issues To Be Raised and Protest:**

14 The Petitioner Cities wish to join in objecting to and protesting PSE’s proposed Schedule 70
15 and 71 for the reasons set forth in the Cities’ Petition to Intervene and Protest filed with the
16 Commission on December 19, 2001, and granted at the Prehearing Conference on December 20,
17 2001. The Petitioner Cities wish to raise and protest the same issues identified in the Cities’ Petition
18 to Intervene and Protest.
19

20 The Petitioner Cities seek late intervention for good cause in that the Petitioner Cities were
21 unable to analyze and determine their interests in this proceeding prior to the Prehearing Conference.
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6. Testimony and Witnesses

The Petitioning Cities have not decided at this time whether to submit written testimony or exhibits or call witnesses, but reserve the right to do so. The Petitioning Cities intend to cross-examine the witnesses called by other parties and to submit written argument.

7. The undersigned submit this Petition to Intervene and Protest and request authorization to participate in this proceeding.

DATED this 25th day of February, 2002.

PRESTON GATES & ELLIS LLP

By _____
Carol S. Arnold, WSBA # 18474
Laura K. Clinton, WSBA # 29846

Attorneys for Petitioners Cities of Bellevue and
Maple Valley

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the Petition to Intervene and Protest of the Cities of Bellevue and Maple Valley upon parties of record in this proceeding, via United States mail:

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DATED: February 26, 2002.

Jo Ann Sunderlage
Secretary to Carol S. Arnold