## BRICKFIELD BURCHETTE RITTS & STONE, PC

WASHINGTON, D.C. AUSTIN, TEXAS

November 9, 2010

# 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: Puget Sound Energy Docket No. UG-101644

Dear Mr. Danner:

Please find enclosed the original 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.

Shaun C. Mohler, Esq.

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Brickfield, Burchette, Ritts & Stone, P.C.

1025 Thomas Jefferson Street, N.W.

8<sup>th</sup> Floor, West Tower

Washington, D.C. 20007

Phone: (202) 342-0800 Facsimile: (202) 342-0807

dex@bbrslaw.com

Enclosure

cc: Service List

#### BEFORE THE

#### WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of PUGET SOUND ENERGY, INC.'s	) ) ) DOCKET UG-101644
Natural Gas Tariff Increase	) ) PETITION TO INTERVENE OF ) NUCOR STEEL SEATTLE, INC )

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"). As required by WAC § 480-07-145(2)(d), Nucor has provided this Petition by electronic mail. In support of this Motion, Nucor states as follows:

- 1. On October 1, 2010, Puget Sound Energy, Inc. ("PSE") filed an application with the Commission for an order authorizing changes to its natural gas rates of less than three percent (3%).
- 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. 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

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

DATED this 9<sup>th</sup> day of November, 2010.

Respectfully submitted,

Damon E. Xenopoulos, Esq.

Shaun C. Mohler, Esq.

Denopoulos

BRICKFIELD, BURCHETTE, RITTS & STONE, P.C.

1025 Thomas Jefferson Street, N.W.

Eighth Floor-West Tower

Washington, D.C. 20007

Telephone: (202) 342-0800 Facsimile: (202) 342-0807

Attorneys for Nucor Steel Seattle, Inc.

### **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served this document upon all parties of record (listed below) in this proceeding, by e-mail and/or first class mail this 9<sup>th</sup> day of November 2010, to the following:

Robert D. Cedarbaum, Senior Counsel 1400 S. Evergreen Park Dr. S.W. P.O. Box 40128 Olympia, WA 98504-0128 bcedarba@utc.wa.gov	Tom DeBoer Director, Rates & Regulatory Affairs Puget Sound Energy (E012) PO Box 97034, PSE-08N Bellevue, WA 98009-9734 Tom.deboer@pse.com
Sally Brown Assistant Attorney General WUTC PO Box 40128 Olympia, WA 98504-0128 sbrown@utc.wa.gov	Simon ffitch AAG Office of the Attorney General 800 Fifth Avenue Seattle, WA 98104-3188 simonf@atg.wa.gov
Paula E. Pyron Executive Director Northwest Industrial Gas Users 4113 Wolf Berry Court Lake Oswego, OR 97035-1827 ppyron@nwigu.org	Chad M. Stokes Tommy A. Brooks Cable Huston 1001 SW Fifth Avenue, Suite 2000 Portland, OR 97204-1136 cstokes@cablehuston.com tbrooks@cablehuston.com
Donald Schoenbeck RCS, Inc. 900 Washington Street, Suite 780 Vancouver, WA 98660 dws@r-c-s-inc.com	Elaine L. Spencer Graham & Dunn PC Pier 70 - 2801 Alaskan Way, #300 Seattle, Washington 98121 espencer@grahamdunn.com

Shaun C. Mohler, Esq.