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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 CITY OF BURIEN

**1. Names and addresses of petitioners:**

CITY OF BURIEN  
C/o Gary Long, City Manager  
415 Southwest 150th Street  
Burien, WA 98166.

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

Carol S. Arnold  
Laura K. Clinton  
Preston Gates & Ellis LLP  
701 Fifth Avenue, Suite 5000  
Seattle, WA 98104-7078  
Business: (206) 623-7580  
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**3. Identity of petitioners:**

The City of Burien is a political subdivision of the State of Washington.

1 **4. Petitioners' interest in this proceeding:**

2 The City of Burien wishes to join the Cities of Auburn, Bellevue, Des Moines, Federal Way,  
3 Maple Valley, Redmond, Renton, SeaTac, and Tukwila ("Cities") as Intervenors in this proceeding.

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

5 Petitioner wishes to join the Cities in objecting to and protesting PSE's proposed rate filing  
6 for the reasons set forth in the Cities' Petition to Intervene and Protest filed with the Commission on  
7 December 19, 2001, and granted at the Prehearing Conference on December 20, 2001. Petitioner  
8 seeks late intervention for good cause in that it was unable to analyze and determine its interests in  
9 this proceeding prior to the Prehearing Conference. Granting Burien's Petition will not enlarge the  
10 issues or create any procedural impact since the other Cities are already active participants in the  
11 proceedings.  
12

13 **6. Testimony and Witnesses**

14 Petitioner has not decided at this time whether to submit written testimony or exhibits or call  
15 witnesses, but reserves the right to do so. Petitioner intends to join the other Cities in cross-  
16 examining the witnesses called by other parties and submitting written argument.  
17

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

20 DATED this \_\_\_\_ day of March, 2002.

21  
22 PRESTON GATES & ELLIS LLP

23  
24 By \_\_\_\_\_  
25 Carol S. Arnold, WSBA # 18474  
26 Laura K. Clinton, WSBA # 29846

Attorneys for Petitioner City of Burien

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CERTIFICATE OF SERVICE

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

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DATED: March 19, 2002.

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Diane Malunat  
Secretary to Carol S. Arnold

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