

area. NRDC is dedicated to protecting natural resources and ensuring a safe and healthy environment. Due to its historic and ongoing work with utility companies and others to achieve these goals, NRDC possesses unique interest in the outcome of this proceeding.

D. NWECA and NRDC have a special interest in this proceeding for the following reasons: (1) NWECA and NRDC members will be directly affected by rate changes and cost shifting among customer classes that may result from this proceeding; (2) rate design modifications that occur as a result of this proceeding may affect customer investment in energy efficiency; (3) decisions made in this proceeding may influence Puget Sound Energy's investments in energy conservation, renewable resources, and low-income energy services; and (4) decisions made regarding this proceeding may set a precedent for decisionmaking in future electric and gas rate cases.

E. NWECA and NRDC intend to examine various issues in this proceeding, including but not limited to investments in energy efficiency and low income energy services, rate design, power cost adjustment, cost allocation, and electric resource portfolio.

F. NWECA and NRDC offer this process considerable expertise in the area of resource planning, industry structure, and economic and policy analysis. NWECA and NRDC have participated in numerous rate cases, mergers, and resource planning proceedings in Oregon, Washington, Idaho, Montana and California.

G. NWECA and NRDC have no intention of unreasonably broadening the issues, burdening the record or delaying the proceeding through their intervention.

For the foregoing reasons, NWECA and NRDC request the Commission grant their motion to co-intervene in this matter.

December 17, 2001

Respectfully submitted,

Sara Patton, Coalition Director
NW Energy Coalition
219 First Ave. South
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CERTIFICATE OF SERVICE

I hereby certify that on this day, December 17, 2001, I have served a copy of the foregoing Motion to Intervene of the NW Energy Coalition and Natural Resources Defense Council by first class, U.S. Mail on the following persons:

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December 17, 2001

Carole Washburn
Executive Secretary
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Re: Puget Sound Energy
Docket Nos. UE-011570 & UG-011571

Dear Ms. Washburn:

Attached for filing with the Commission please find an original plus fourteen (14) copies of the NW Energy Coalition's and Natural Resources Defense Council's petition to co-intervene in the above referenced proceeding. Because the Coalition operates on a Macintosh platform using MS Word, I e-mailed a copy of the petition to intervene to the Records Department rather than submitting a potentially unreadable disk copy.

Thank you for your assistance.

Sincerely,

Danielle Dixon
Policy Associate
NW Energy Coalition

Encl.
cc: all parties