BEFORE THE STATE OF WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,	)	DOCKETS UE-170033 and UG-170034
Complainant,	)	
v.	)	PETITION TO INTERVENE BY THE STATE OF MONTANA
PUGET SOUND ENERGY,	)	
Respondent.	)	
. . . . .	)	

INTRODUCTION AND IDENTITY OF PETITIONER

1. Pursuant to Washington Admistrative Code ("WAC") 480-07-355 of the Procedural Rules of the Washington Utilities and Transportation Commission ("Commission"), Revised Code of Washington ("RCW") 34.05.443, Order 01 and the Notice of Prehearing Conference on file in the above-captioned matter, the State of Montana ("Montana") hereby petitions the Commission for permission to intervene with full party status in the above-captioned matter, pursuant to WAC 480-07-340.

2. Montana is represented in this matter by lead counsel Robert M. McKenna. Mr. McKenna is duly licensed and admitted to the practice of law in the State of

Washington. Mr. McKenna and co-counsel Brian T. Moran, also duly licensed and admitted to practice in the State ofWashington, will file Notices of Appearance with the Commission pursuant to WAC 480-07-345(2). Both counsel are familiar with the pleadings and other documents on file to date and the issues to be considered by the Commission.

3. The Colstrip coal-fired generating units ("Colstrip Units") in which Puget Sound Energy ("PSE") has an ownership interest are located in Montana. Colstrip Units 1 & 2 were built in the 1970's in response to the energy crisis. Power transmission lines were employed to transfer inexpensive, reliable baseload power from Montana to utility customers in the State of Washington ("Washington"). The availability of this electric power to Washington industries, businesses, and residential customers has been beneficial to both states.

4. Included in the pleadings and related documents filed to date by PSE with the Commission in the above-captioned proceeding is the prefiled testimony of Mr. David Mills and Mr. Ronald Roberts. Both individuals touch on some aspects of the costs attendant to closing Colstrip Units 1 & 2, such as the costs of decommissioning and remediation. As noted in Mr. Roberts' testimony, Montana currently has no statutory authority addressing the Units' decommissioning and remediation but the Montana legislature is currently is considering a bill addressing those issues.

INTEREST OF THE PETITIONER IN THE PROCEEDING

5. During the 2016 Regular Session of the Washington State Legislature, ESSB 6248, codified at RCW 80.84.010, was adopted and then signed into law by the Governor on April 1, 2016. This Act allows PSE to seek approval from the Commission in the context of an adjudicative proceeding, brought under RCW 34.05 and RCW 80.04, to place amounts from one or more regulatory liabilities into a retirement account to cover decommissioning and remediation costs of eligible coal-fired generating facilities.

6. RCW 80.84.010 (enacted as ESSB 6248) defines an "eligible coal plant" as:

> a coal-fired electric generation facility that: (a) Had two or fewer generating units as of January 1, 1980, and four generating units as of January 1, 2016; (b) is owned by more than one electrical company as of January 1, 2016; and (c) provides, as a portion of the load served by the coal-fired electric generation facility, electricity paid for in rates by customers in the state of Washington.

7. Thus, the Colstrip Units are "eligible coal plants" under RCW 80.84.010.

8. Many thousands of Montana residents will be economically impacted, directly or indirectly, by the closure of the Colstrip Units. In addition to anticipated job losses, the revenue generated by the Colstrip Units, which is taxed by Montana, funds public schools, libraries, parks and regional water systems. Thus, Montana has a direct and substantial interest in the economic issues to be addressed in the above-captioned proceeding.

9. In addition, Montana has a direct and substantial interest in ensuring the full costs of decommissioning and remediation attendant to closing the Colstrip Units are covered by PSE, in keeping with the high value Montana residents place on their environment and consistent with RCW 80.84.010.

10. Montana wishes to reserve the ability to submit written testimony and exhibits in this proceeding, and anticipates it will cross-examine witnesses called by other parties and submit written arguments and/or motions.

NAME AND ADDRESS OF PETITIONER'S ATTORNEY

10. Montana consents to service by electronic mail only and requests that the following individuals be added to the service list for these consolidated matters:

Petitioner-Intervenor Representatives	**Information Only**
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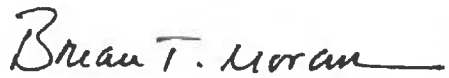
CONCLUSION

For the foregoing reasons, the State of Montana respectfully seeks leave to intervene and requests that it be granted full-party intervenor status in the above-captioned proceeding.

Dated this 6th day of February, 2017.

Respectfully submitted,



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WASHINTON UTILITIES AND TRANSPORTATION COMMISSION
DOCKETS EU-170033 AND UG 170034

I hereby certify that I have this day served the attached Petition to Intervene by the State of Montana upon the persons and entities listed on the Service List below via electronic and United States mail, addressed as shown below, with first class postage prepaid.

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DATED at Seattle, Washington this 6th day of February, 2017.

Leslie Peterson