

**BEFORE THE  
PUBLIC SERVICE COMMISSION OF WISCONSIN**

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Application of Madison Gas and Electric Company for  
Authority to Change Electric and Natural Gas Rates

Docket No. 3270-UR-120

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**REQUEST TO INTERVENE AND NOTICE OF APPEARANCE ON BEHALF OF THE  
CITY OF MADISON**

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Pursuant to Wis. Stat. Sec. 227.44(2m) and Wis. Admin Code PSC 2.21, the City of Madison (the “City”) hereby requests to intervene in the above-captioned matter.

I. City’s Request to Intervene

The City is a Wisconsin municipality. It is approximately 77.87 square miles and home to an estimated 240,000 persons. The City, through its departments and public utilities, is responsible for providing numerous services to its citizens and visitors, most of which require, in some capacity, the use of electricity and natural gas. Due to the City’s sheer size and the significant power needs of its numerous departments and utilities, it is one of the largest single customers of Applicant, Madison Gas and Electricity (MGE). Indeed, in 2013 the City paid \$6,175,573.21 for electrical costs (47,244,935 kWh), and \$696,706.81 (1,097,702 therms) for natural gas costs. Given the City’s annual energy needs, MGE’s request to increase rates, if granted, will affect the City’s substantial interests.

For these reasons, the City requests to intervene in the above-captioned matter pursuant to Wis. Stat. Sec. 227.44(2m) and Wis. Admin Code PSC 2.21.

II. Notice of Appearance

The City is represented in this matter by Assistant City Attorney Doran Viste and all further documents and correspondence should be served on:

Doran Viste  
Assistant City Attorney  
Office of the City Attorney  
210 Martin Luther King Jr. Blvd, Rm. 401  
Madison, WI 53703-3345  
Phone: (608) 266-4511  
Fax: (608) 267-8715  
e-mail: [dviste@cityofmadison.com](mailto:dviste@cityofmadison.com)

The City further requests that all documents and correspondence be served on:

Jeanne Hoffman  
Facilities and Sustainability Manager  
210 Martin Luther King Jr. Blvd, Rm. 115  
Madison, WI 53703  
Phone: (608) 266-4091  
Fax: (608) 264-9275  
e-mail: [jhoffman@cityofmadison.com](mailto:jhoffman@cityofmadison.com)

### III. Conclusion

For the aforementioned reasons, the City respectfully requests that the Commission grant its request to intervene in the above-captioned matter as, pursuant to Wis. Admin Code PSC 2.21(1), the City has substantial interests that may be affected by the Commission's action in this proceeding.

Dated at Madison, Wisconsin, this 11<sup>th</sup> day of June, 2014.

*/s/ Doran Edward Viste*

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Doran Viste  
Assistant City Attorney  
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