

**BEFORE THE
GUAM PUBLIC UTILITIES COMMISSION**



**AMENDED PETITION FOR
APPROVAL TO ADJUST
GUAM POWER AUTHORITY'S
BASE RATE**

GPA DOCKET 25-14

PETITION FOR LEAVE TO INTERVENE AND BECOME A PARTY

Pursuant to Part 2, Rule 8 of the Rules of Practice and Procedure of the Public Utilities Commission of the Territory of Guam (PUC), this Petition for Leave to Intervene and Become a Party before the PUC (Docket No. 25-14) is respectfully submitted by the Department of the Navy on behalf of the Department of Defense (collectively referred to herein as DoD¹), by and through its attorneys.

As grounds for intervention Movant avers as follows:

1. Movant maintains numerous military installations within the Territory of Guam which activities obtain and use electric services from applicant Guam Power Authority (GPA), a publicly regulated utility subject to this Commission's jurisdiction. The nature and extent of DoD's property, financial and other interests on Guam are substantial. DoD is one of the largest purchasers of electric services in the Territory of Guam. The DoD has been a party in other dockets related to revenue requirement or cost allocation and rate design issues. The DoD has a crucial and strategic interest in electric services at the lowest reasonable and nondiscriminatory cost.

2. The nature of the matters which are the subject of this docket could have a substantial impact on the Movant.

3. It is not unlikely that the Movant's positions may be different from those advocated by GPA, the Attorney General of Guam, or any other party to the proceeding.

4. Movant's participation can assist in producing complete and accurate discovery and developing a sound record. The DoD believes its participation will enable the Commission to view and consider all the pertinent available information.

¹ Although E.O. 14347 allowed for usage of the additional secondary title of Department of War, the Department of Defense remains the official name by statute and is therefore used herein.

5. Movant's intervention would serve the public interest in that Movant expends funds on behalf of the taxpayers of the United States in the furtherance of the goals and objectives of the Government. It is in the taxpayers' interest to ensure that their tax dollars are (1) being spent to buy necessary goods and services that are reasonable in price, and (2) to ensure that the expertise available to their government is utilized to its maximum extent in ensuring the reasonableness and continued availability of the utility services to the Government and the general public at the least cost. Movant's intervention would not unreasonably broaden the issues or delay the proceedings in this docket.

6. Communications in regard to this petition are to be addressed to:

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WHEREFORE, Movant requests an order granting Movant's Petition for Leave to Intervene and Become a Party hereto with the right to have notice of, and appear at the taking of testimony, produce and cross examine witnesses, and be heard in person or by counsel, upon brief and at oral argument, if oral argument is granted, and to otherwise be granted full party status herein.

Dated: 14 November 2025

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Rebecca J. Wrightson', with a long horizontal flourish extending to the right.

Rebecca J. Wrightson
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ATTORNEY FOR THE
DEPARTMENT OF DEFENSE

CERTIFICATE OF SERVICE

I hereby certify, pursuant to Rule 4, that on 14 November 2025, I caused service of eight copies of the Department of the Navy's Petition for Leave to Intervene and Become a Party and by hand delivery to the Public Utilities Commission of Guam:

Public Utilities Commission of Guam
Suite 207, GCIC Building
414 West Soledad Avenue
Hagatna, GU 96910

Additional copies were served by hand delivery on 14 November 2025 to:

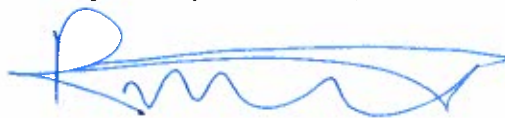
John M. Benavente
General Manager
Guam Power Authority
Gloria B. Nelson Public Service Building
Mangilao, Guam 96913

Additional copies were served by email on 14 November 2025 to:

Bernard W. Givan
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Dated 14 November 2025

Respectfully submitted,



Rebecca J. Wrightson
Assistant Counsel (09C)
NAVFAC Marianas