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December 1, 2006

**VIA FEDERAL EXPRESS
AND ELECTRONIC FILING**

Carol Washburn
Executive Secretary
Washington Utilities & Transportation
Commission
1300 S. Evergreen Park Drive, S.W.
P.O. Box 47250
Olympia, WA 98504-7250

Re: *Cost Management Services, Inc. v. Cascade Natural Gas Corporation*
WUTC Docket No. UG-061256

Dear Ms. Washburn:

Enclosed please find an original and 10 copies of the Reply Brief of the Northwest Industrial Gas Users (NWIGU) in the above-referenced docket. An electronic submission will be sent to the Records Center on December 1, 2006 as well as to all parties listed on the service list.

Thank you for your assistance.

Very truly yours,



Edward A. Finklea

EAF/tr
Enclosures
cc: Service List

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

COST MANAGEMENT SERVICES,)	
INC.,)	
)	
Complainant,)	
)	DOCKET NO. UG-061256
v.)	
)	
CASCADE NATURAL GAS)	
CORPORATION,)	
)	
Respondent.)	
)	

**REPLY BRIEF
OF THE
NORTHWEST INDUSTRIAL GAS USERS**

December 1, 2006

1. Pursuant to the procedural schedule adopted in Prehearing Conference Order 01, the Northwest Industrial Gas Users (“NWIGU”) hereby file this Reply Brief in the above-captioned proceeding.

2. All parties to this dispute appear to be in agreement with NWIGU’s position that regardless of the outcome of the underlying dispute between Cost Management Services Inc. (“CMS”) and Cascade Natural Gas Corporation (“Cascade” or the “Company”), contracts between Cascade and current customers should remain in place. If the Washington Utilities and Transportation Commission (“Commission”) concludes that the law requires the Commission to order Cascade to cease making any gas sales, prospective remedies should be fashioned so that customers of Cascade that are part of current contractual arrangements are not harmed as a result of any remedial action this Commission deems appropriate. Cascade, not any of the customers purchasing the gas, must be responsible for any economic losses customers could incur if the Commission rules that Cascade’s gas sales activities violate state or federal law. That principle should apply whether the Commission’s decision impacts only customers within Cascade’s Washington service territory, or customers outside the Company’s Washington service territory.

CONCLUSION

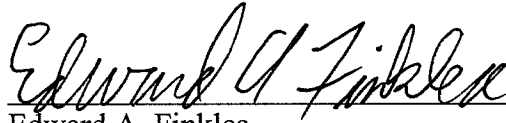
3. NWIGU does not take a position on the merits of CMS’s complaint. If the Commission determines that there is merit to CMS’s claims, however, NWIGU urges the Commission to ensure that customers of Cascade that use the Company as their marketer/supplier are protected from any financial harm or supply risks that may arise from this proceeding.

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Dated: December 1, 2006.

Respectfully submitted,



Edward A. Finklea

Chad M. Stokes

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CERTIFICATE OF SERVICE

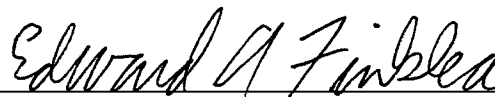
I HEREBY CERTIFY that I have this day served the foregoing **NORTHWEST INDUSTRIAL GAS USER'S REPLY BRIEF** upon all parties of record in these proceedings, as indicted below, by electronic mail and/or mailing a copy properly addressed with first class postage prepaid.

SERVICE LIST

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Dated in Portland, Oregon this 1st day of December, 2006.



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