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December 14, 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: *In the Matter of the Petition of Avista Corporation d/b/a Avista Utilities For an Order Authorizing Implementation of a Natural Gas Decoupling Mechanism and to Record Accounting Entries Associated With the Mechanism.*  
WUTC Docket No. UG-060518

Dear Ms. Washburn:

This letter submits for filing the original and eight copies of the Initial Brief of the Northwest Industrial Gas Users in the above-referenced proceeding.

Thank you for your assistance.

Very truly yours,



Edward A. Finklea

EAF/tr  
Enclosures

**BEFORE THE**  
**WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of )  
Avista Corporation d/b/a Avista Utilities )  
For an Order Authorizing Implementation )  
of a Natural Gas Decoupling Mechanism )  
and to Record Accounting Entries )  
Associated With the Mechanism. )  
\_\_\_\_\_ )

**DOCKET NO. UG-060518**

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

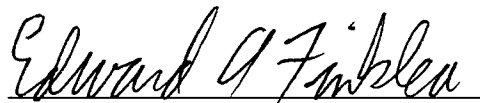
December 14, 2006

1. Pursuant to the procedural schedule adopted by Administrative Law Judge C. Robert Wallis, the Northwest Industrial Gas Users (“NWIGU”) hereby submit this Initial Brief in the above-referenced proceeding.
2. Avista Corporation d/b/a Avista Utilities, Commission Staff, NW Energy Coalition and NWIGU entered a Settlement Agreement (“Settlement”) to resolve all outstanding issues in this docket. Public Counsel objects to the Settlement.
3. NWIGU respectfully requests that the Washington Utilities and Transportation Commission (“WUTC” or “Commission”) approve the Settlement as a negotiated package. NWIGU is not opposed to other approaches to address utility decoupling concerns, but supports this pilot as presented in the Settlement.

**Conclusion**

4. NWIGU respectfully requests that the Commission approve the Settlement in its entirety as a negotiated package. The Settlement is in the public interest and should be approved.

DATED: December 14, 2006.



Edward A. Finklea, OSB No. 84216  
Chad M. Stokes, OSB No. 00400  
Cable Huston Benedict Haagensen & Lloyd LLP

Of Attorneys for  
NORTHWEST INDUSTRIAL GAS USERS

## CERTIFICATE OF SERVICE

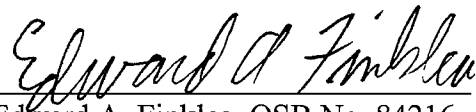
I HEREBY CERTIFY that on December 14, 2006, I caused to be served the foregoing **NORTHWEST INDUSTRIAL GAS USERS' INITIAL BRIEF** upon all parties of record on the following current Service List of these proceedings via electronic mail and/or mailing a copy properly addressed with first class postage prepaid on:

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DATED: December 14, 2006.



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