

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

Washington Utilities and Transportation Commission,	)	Docket No UG-041515
	)	
Plaintiff,	)	NORTHWEST INDUSTRIAL
	)	GAS USERS' PETITION TO
v.	)	INTERVENE
	)	
Avista Corporation d/b/a Avista Utilities.	)	
	)	
Respondent.	)	
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Pursuant to WAC § 480-07-355, the Northwest Industrial Gas Users (“NWIGU”) hereby submit this Petition to Intervene in the above-captioned proceedings. As required by WAC §480-07-145(2)(d), NWIGU has provided this Petition in electronic format by email. In support of this Petition to Intervene, NWIGU states the following:

1. The following name and address for NWIGU should be included on the official list of parties of record in these proceedings, and all correspondence and communications concerning these proceedings should be addressed to:

Paula E. Pyron  
Executive Director  
Northwest Industrial Gas Users  
4113 Wolf Berry Court  
Lake Oswego, OR 97035-1827  
Telephone: (503) 636-2580  
Facsimile: (503) 636-0703  
E-mail: ppyron@nwigu.org

Paula Pyron is designated as the person to receive service of documents on behalf of NWIGU in this proceeding.

Ed Finklea and Chad Stokes of Cable Huston Benedict Haagensen & Lloyd LLP will represent NWIGU in these proceedings, and have filed a separate Notice of Appearance as required in WAC §480-07-345(2). All correspondence and communications concerning these proceedings should be addressed to:

Edward A. Finklea  
Chad M. Stokes  
Cable Huston Benedict Haagensen & Lloyd LLP  
1001 SW 5<sup>th</sup> Avenue  
Suite 2000  
Portland, OR 97204-1136  
Telephone: (503) 224-3092  
Facsimile: (503) 224-3176  
E-mail: [efinklea@chbh.com](mailto:efinklea@chbh.com)  
[cstokes@chbh.com](mailto:cstokes@chbh.com)

2. NWIGU is a nonprofit association comprised of thirty-two end-users of natural gas with major facilities in the states of Washington, Oregon and Idaho. NWIGU members include diverse industrial interests, including food processing, pulp and paper, wood products, electric generation, aluminum, steel, chemicals, electronics and aerospace. The association provides an information service to its members and participates in various regulatory matters that affect member interests. NWIGU member companies purchase natural gas sales and transportation services from local distribution companies (“LDCs”), including Avista Corporation (“Avista” or the “Company”).

3. On August 19, 2004, Avista submitted to the Washington Utilities and Transportation Commission (“WUTC” or “Commission”) a filing requesting general rate

increases for its gas operations. Avista seeks to increase the rates it charges for natural gas local delivery by \$8.6 million, which is approximately a 6.2 percent increase in the Company's current gas delivery charges. The Commission has suspended the Company's proposed tariff revisions in its gas filing and instituted hearing procedures to address their investigation.

4. Avista's request for authority to charge higher rates for its natural gas delivery services will impact NWIGU member companies' interests. NWIGU members have a direct and substantial interest in Avista's request for authority to increase the rates charged its natural gas sales and transportation customers for delivery services. No other party can adequately represent NWIGU member companies' interests, and the Commission's determination in this proceeding will directly affect NWIGU member companies.

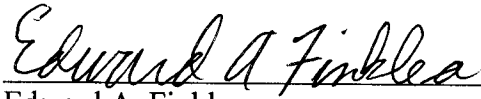
5. NWIGU reserves the right to propound data requests, review responses to data requests, submit testimony and exhibits, call witnesses, cross-examine all witnesses called by other parties and submit any written arguments and motions that may be appropriate to represent its interests in these proceedings.

6. NWIGU's participation in these proceedings will assist the Commission in resolving the issues in these proceedings and will not unreasonably broaden the issues, unduly burden the record, or delay these proceedings.

WHEREFORE, based upon the foregoing, NWIGU respectfully requests leave to intervene as a party in these proceedings, with all of the procedural and substantive rights associated with full party status as described in WAC §480-07-340.

Dated: September 22, 2004.

Respectfully submitted,

A handwritten signature in cursive script that reads "Edward A. Finklea". The signature is written in black ink and is positioned above a horizontal line.

Edward A. Finklea

Chad M. Stokes

Cable Huston Benedict

Haagensen & Lloyd LLP

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E-mail: [efinklea@chbh.com](mailto:efinklea@chbh.com)

Of Attorneys for the  
Northwest Industrial Gas Users

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have this day served the foregoing document upon all parties of record in these proceedings by mailing a copy properly addressed with first class postage prepaid.

Dated in Portland this 22<sup>rd</sup> day of September, 2004.



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