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September 7, 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 twelve copies of the following two documents:

- 1) Northwest Industrial Gas Users' Petition to Intervene, and
- 2) Notice of Appearance on Behalf of the Northwest Industrial Gas Users

These documents have also been transmitted to you via electronic mail, in both Word and PDF formats. Paper copies will be mailed to all on the WUTC's current Service List.

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)	DOCKET NO. UG-060518
Avista Corporation d/b/a Avista Utilities)	
For an Order Authorizing Implementation)	NORTHWEST INDUSTRIAL GAS
of a Natural Gas Decoupling Mechanism)	USERS' PETITION TO INTERVENE
and to Record Accounting Entries)	
Associated With the Mechanism.)	
_____)	

The Northwest Industrial Gas Users (“NWIGU”) hereby submits this Petition to Intervene in the above-captioned proceedings.

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:

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Chad M. Stokes
Cable Huston Benedict Haagensen & Lloyd LLP
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Don Schoenbeck
RCS, Inc.
900 Washington St. Ste. 780
Vancouver, WA 98660
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2. This Petition to Intervene is submitted pursuant to WAC § 480-07-355. As required by WAC §480-07-145(2) (d), NWIGU has provided this Petition by electronic mail. In support of this Petition to Intervene, NWIGU states the following:

3. 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 Utilities (“Avista” or the “Company”).

4. On April 14, 2006, Avista submitted to the Washington Utilities and Transportation Commission (“WUTC” or “Commission”) a filing requesting approval of a proposed Natural Gas Decoupling Mechanism and authority to begin recording accounting entries associated with the decoupling mechanism. The WUTC has suspended the filing and set the matter for hearing.

5. Avista's request for authority to institute Natural Gas Decoupling Mechanism for its natural gas services will impact the interests of NWIGU member companies. NWIGU members have a direct and substantial interest in Avista's request as the mechanism will impact the rates charged to its natural gas customers. No other party can adequately represent NWIGU member companies' interests, and the Commission's determination in this proceeding will directly affect NWIGU member companies.

6. NWIGU requests permission to file this Petition to Intervene after the prehearing conference. NWIGU's counsel intended to participate in the prehearing conference held in this matter on September 6, 2006 by telephone. The prehearing conference, however, was held in Seattle and counsel failed to prearrange for phone access and, thus, was unsuccessful in his attempt to participate by phone. Counsel has spoken with counsel for Avista, and Avista does not object to NWIGU's effort to intervene as a party at this stage of the proceeding. NWIGU accepts the schedule adopted at the prehearing conference.

7. 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.

8. 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.

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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 7, 2006.

Respectfully submitted,



Edward A. Finklea

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Northwest Industrial Gas Users

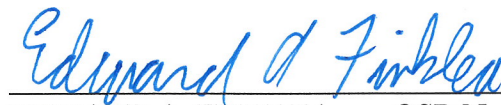
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing PETITION TO INTERVENE 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

Avista Corporation d/b/a Avista Utilities Kelly Norwood, Vice President State and Federal Regulation 1411 E. Mission Avenue, MSC-13 PO Box 3727 Spokane, WA 99220-3727	David J. Meyer VP and Chief Counsel Regulatory and Governmental Affairs Avista Corporation 1411 E. Mission Avenue, MSC-13 PO Box 3727 Spokane, WA 99220-3727 dmeyer@avistacorp.com
Simon ffitch AAG Office of Attorney General 900 Fourth Avenue, Suite 2000 Seattle, WA 98164-1012 simonf@atg.wa.gov	Donald T. Trotter Assistant Attorney General 1400 S. Evergreen Park Drive SW PO Box 40128 Olympia, WA 98504-0128 dtrotter@wutc.wa.gov

Dated in Portland, Oregon this 7th day of September, 2006.



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