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April 9, 2007

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

Cost Management Services, Inc. v. Cascade Natural Gas Corporation

WUTC Docket No. UG-061256

Dear Ms. Washburn:

Re:

This letter submits for filing the original and seven copies of Northwest Industrial Gas User's Response to Motion for Clarification in the above-referenced proceeding.

This document has also been transmitted to you via electronic mail in PDF format. Paper copies will be mailed to all on the WUTC's current Service List.

Thank you for your assistance.

Very truly yours,

Sward A Finklea

EAF/tr Enclosures

cc: Service List

BEFORE THE

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

COST MANAGEMENT SERVICES, INC.,)) DOCKET NO. UG-061256
Complainant,) NORTHWEST INDUSTRIAL GAS USER'S RESPONSE TO MOTION FOR
v.) CLARIFICATION
CASCADE NATURAL GAS CORPORATION,)))
Respondent.)))

1

The Northwest Industrial Gas Users ("NWIGU") hereby responds to the Motion for Clarification submitted by Cascade Natural Gas Corporation ("Cascade") on March 22, 2007. NWIGU has a narrow, but important, concern as these dockets move forward. As a result of the Commission's Order No. 3 in this docket, Cascade must file its contracts with non-core customers for the sale of gas commodity and upstream services within thirty days of issuance of that Order ("Historic Contracts"). These Historic Contracts must be treated as confidential.

2

NWIGU's concern throughout this proceeding has been that customers that have entered into gas commodity and capacity arrangements with Cascade should be held harmless from any action in this docket. In the earlier phase of this proceeding, NWIGU urged the Commission to fashion a remedy in this proceeding "so that customers of Cascade that are part of current contract arrangements are not harmed as a result of any remedial action this Commission deems appropriate." The Commission concurred with NWIGU in its Order that Cascade's conduct could be brought into compliance with the Commission's regulations without harming existing customers.

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3

NWIGU's concern at this time is that the terms of these Historic Contracts be treated in a confidential manner so as to avoid harm to existing customers of Cascade. This is a very serious concern for companies that entered into these arrangements with Cascade prior to this proceeding. Public disclosure of gas usage and pricing information could damage the competitive position of a customer that is a party to one of these historic contracts.

4

NWIGU therefore requests that to the extent the Commission requires Cascade to file Historic Contracts that the Commission provides continued confidential treatment of the terms and conditions of those contracts. If the Commission decides that basic term sheets on each contract are necessary to be filed to enable the Commission to make its determinations, NWIGU requests that the name of the customer and the volume of gas purchased be treated as confidential commercial information that will not be subject to public disclosure. The WUTC has a long tradition of masking customer names and volumes in public records used to assess the reasonableness of a rate increase request by a gas utility. If Historic Contracts are going to be filed with this Commission and subjected to review, the information should be treated in such a way that customers' names and the volumes of their purchases are kept from public disclosure so as not to harm the competitive position of a customer through disclosure of information that could be damaging to a company if the information found its way into the hands of a competitor. This protection would in no way impair the ability of the Commission Staff, Public Counsel, CMS or any other party from participating in the Commission's investigation of these matters, but would provide the requisite protection these customers need.

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DATED: April 9, 2007.

Respectfully submitted,

Edward A. Finklea

Chad M. Stokes

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Of Attorneys for the Northwest Industrial Gas Users

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I caused the foregoing NORTHWEST

INDUSTRIAL GAS USER'S RESPONSE TO MOTION FOR CLARIFICATION

to be served upon all parties of record on the following current service list for these proceedings by mailing a copy properly addressed with first class postage prepaid:

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DATED: April 9, 2007.

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