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September 13, 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:

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 PDF format. 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  
cc: Service List

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

COST MANAGEMENT SERVICES, INC.,	)	DOCKET NO. UG-061256
	)	
	)	
Complainant,	)	NORTHWEST INDUSTRIAL GAS
	)	USERS' PETITION TO INTERVENE
v.	)	
	)	
CASCADE NATURAL GAS CORPORATION,	)	
	)	
	)	
Respondent.	)	
	)	

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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:

Edward A. Finklea  
Chad M. Stokes  
Cable Huston Benedict Haagensen & Lloyd LLP  
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E-mail: dws@r-c-s-inc.com

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 Cascade Natural Gas Corporation (“Cascade” or the “Company”).

4. On August 1, 2006, Cost Management Services, Inc. (“CMS”) brought a complaint against Cascade alleging that Cascade has violated certain Washington statutes in connection with certain retail sales of natural gas to certain customers under Rate Schedules 663 and 664. CMS asks this Commission to order Cascade to cease and desist from making certain

sales and to determine whether certain contracts Cascade has entered into with some customers are “void or voidable.” Complaint at 2.

5. CMS’s complaint against Cascade may impact the interests of NWIGU member companies. Some NWIGU member companies purchase services from Cascade under contracts that could be impacted by the CMS complaint. Thus, NWIGU members have a direct and substantial interest in this complaint proceeding. No other party can adequately represent NWIGU member companies’ interests, and the Commission’s determination in this proceeding could directly affect NWIGU member companies.

6. NWIGU seeks party status in this proceeding and seeks, through its intervention, to protect the rights of Rate Schedule 663/664 customers who have current contracts with Cascade. In the event that this Commission determines that there is merit to any of the issues raised by CMS’s complaint, NWIGU asks that this Commission fashion a remedy that protects any customers. Customers of Cascade should not suffer any harm as a result of any actions by Cascade that are the subject of this complaint. Any feasible remedy must make customers whole regardless of any determination made by this Commission regarding the legality of Cascade’s actions.

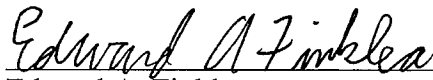
7. NWIGU reserves the right to propound data requests, review responses to data requests, submit testimony and exhibits, call witnesses, cross-examine all witnesses called by other parties and submit any written arguments and motions that may be appropriate to represent its interests in these proceedings.

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.

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 13, 2006.

Respectfully submitted,



Edward A. Finklea

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Of Attorneys for the  
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

JON T. STOLTZ Senior Vice President Cascade Natural Gas Rates and Planning PO Box 24464 Seattle, WA 98124	CHARLES M. EBERDT Manager The Energy Project 1701 Ellis Street Bellingham, WA 98225
JOHN A. CAMERON Davis Wright Tremaine LLP 1300SW Fifth Avenue, Suite 2300 Portland, OR 97201 Attorney for Cost Management Services, Inc.	P. DOUGLAS BETZOLD Chief Executive Officer Cost Management Services, Inc. 2737 78 <sup>th</sup> Avenue SE Mercer Island, WA 98040
VINCENT J. DIAZ International Chemical Workers Union Local 121-C 1095 Makah Place Fox Island, WA 98333	GREG J. TRAUTMAN Assistant Attorney General, WUTC Attorney General's Office PO Box 40128 Olympia, WA 98504-0128 Attorney for WUTC
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NANCY GLASER DANIELLE DIXON NW Energy Coalition 219 First Avenue South, Suite 100 Seattle, WA 98104	DON SCHOENBECK RCS, Inc. 900 Washington Street, Suite 780 Vancouver, WA 98660

BRAD M. PURDY Attorney at Law 2019 N. 17 <sup>th</sup> Street Boise, ID 83702 Attorney for The Energy Project	SCOTT MAGIE Project Director Mint Farm Energy Center LLC 1200 Prudential Blvd. Longview, WA 98632
Paula E. Pyron, Executive Director Northwest Industrial Gas Users 4113 Wolf Berry Court Lake Oswego, OR 97035-1827	Ryan Flynn Davis Wright Tremaine, LLP Representing Coast Management Services 1300 SW Fifth Avenue, Suite 2300 Portland, OR 97201
Sally Johnston Assistant Attorney General WUTC Attorney General Section Representing WUTC State Mail Stop 40128	Simon Ffitch AAG Office of the Attorney General Public Counsel 900 4 <sup>th</sup> Avenue, Suite 2000 Seattle, WA 98164

Dated in Portland, Oregon this 13th day of September, 2006.

*Edward A Finklea*

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