

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

COST MANAGEMENT SERVICES, INC.,
Complainant,
v.
CASCADE NATURAL GAS CORPORATION,
Respondent.

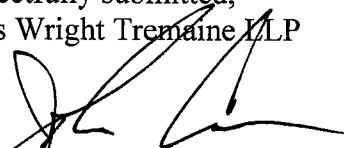
Docket No. UG-061256

**MOTION OF COST MANAGEMENT
SERVICES, INC., TO LODGE
AFFIDAVIT OF DOUGLAS
BETZOLD CONCERNING
CONFIDENTIAL INFORMATION
COVERED BY PROTECTIVE
ORDERS**

1. On April 16, 2007, Respondent Cascade Natural Gas Corporation ("Cascade") filed its "Response To Motion Of Cost Management Services, Inc., For Leave To File Amended Complaint." That response contained unfortunate speculations that mischaracterized an error by which a one-page exhibit to a supporting affidavit was mistakenly filed in unredacted form by Cost Management Services, Inc.
2. There was no improper motive relating to the mistake, which was promptly corrected. The attached affidavit of Douglas Betzold, explains efforts taken by CMS to ensure that there was no improper dissemination of any confidential information covered by Commission protectives. CMS asks the Commission to accept this affidavit so that mischaracterizations in Cascade's response may be corrected and the record set straight.

DATED this 19th day of April, 2007.

Respectfully submitted,
Davis Wright Tremaine LLP

By: 
John A. Cameron, OSB #92037
Francie Cushman, OSB #03301
Of Attorneys for Complainant Cost
Management Services, Inc.

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matters of

Docket No. UG-061256

COST MANAGEMENT SERVICES, INC.,
Complainant,
v.
CASCADE NATURAL GAS CORPORATION,
Respondent.

**AFFIDAVIT OF DOUGLAS BETZOLD
CONCERNING CONFIDENTIAL
INFORMATION COVERED BY
PROTECTIVE ORDERS**

STATE OF WASHINGTON
COUNTY OF KING

I, Douglas Betzold, hereby declare under penalty of perjury under the laws of the State of Washington that the following are true and correct:

1. I am the CEO of Cost Management Services, Inc. ("CMS"), and I make this affidavit based on personal knowledge.
2. I am not a signatory to the protective order applicable to this docket.
3. On the afternoon of April 9, 2007, CMS filed a Motion for Leave to File Amended Complaint, along with an Amended Complaint. I have been advised by my counsel, John Cameron, that the Amended Complaint and the supporting affidavit of Donald Schoenbeck contain confidential information covered by the protective order in this case. Mr. Schoenbeck is expert retained by CMS to analyze potential cross-subsidization occurring in Cascade's gas supply contracts with non-core customers.
4. On the morning of April 10, Mr. Cameron was advised that a one-page exhibit to the Schoenbeck affidavit had been submitted without redaction. Upon making this discovery, Mr. Cameron called me on April 10, 2007, to advise me of the mistake. He

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INFORMATION COVERED BY PROTECTIVE ORDERS

directed me not to access any information on the Commission's website unless and until the Schoenbeck exhibit was replaced with a redacted version.

5. At the time I was called by Mr. Cameron, I had not accessed the Commission's website since before April 9. Prior to the submissions by CMS on April 9, I had reviewed a redacted draft version of the Amended Complaint, but I had not seen the Schoenbeck affidavit or its exhibit even in redacted form. I complied with Mr. Cameron's directive not to access the website. At no time have I obtained confidential information in this docket or in Docket No. UG-060256, the Cascade general rate case.

6. I have reviewed Cascade Natural Gas Corporation's response to the CMS motion for leave to file its Amended Complaint. To the best of my knowledge, Cascade has no basis for claiming that the Schoenbeck-affidavit exhibit was filed in unredacted form so that I could have access to confidential information. This claim is false. I have seen only the redacted versions of the amended complaint, the Schoenbeck affidavit and the exhibit to the Schoenbeck affidavit.

Executed this 18 day of April, 2007, at Monter Island Washington.

P. D. Betzold

Douglas Betzold

SUBSCRIBED AND SWORN TO before me this 18th day of April, 2007

Lissette Maftoun-Semnani

Lissette Maftoun-Semnani

Notary Public for State of Washington

My Commission Expires: Jan. 28, 2008



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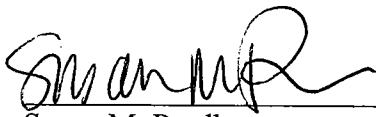
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this 19th day of April, 2007, served the foregoing **MOTION OF COST MANAGEMENT SERVICES, INC., TO LODGE AFFIDAVIT OF DOUGLAS P. BETZOLD** upon parties of record in these proceeding via Email and US Mail, as follows:

UG-061256				
PARTY	REPRESENTATIVE	PHONE	FACSIMILE	E-MAIL
Cascade Natural Gas	JAMES M. VAN NOSTRAND LAURENCE REICHMAN Perkins Coie LLP 1120 NW Couch St. 10 th Floor Portland, OR 97209-4128 JON STOLTZ	(503) 727-2162 (503) 727-2019	(503) 346-2162 (Same)	JVanNostrand@perkinscoie.com LReichman@perkinscoie.com jstoltz@cngc.com
Northwest Industrial Gas Users	EDWARD A. FINKLEA CHAD M. STOKES Cable Huston Benedict Haagensen & Lloyd LLP 1001 SW Fifth Avenue Suite 2000 Portland, OR 97204-1136	(503) 224-3092 (503) 224-3092	(503) 224-3176 (503) 224-3176	efinklea@chbh.com cstokes@chbh.com
Public Counsel	JUDY KREBS Public Counsel Section Office of Attorney General 800 Fifth Avenue Suite 2000 Seattle, WA 98104-3188 STEVE JOHNSON KATHRYN ZSOKA	(206) 464-6595	(206) 389-2079	judyk@atg.wa.gov stevenj@atg.wa.gov kathrynz@atg.wa.gov
Commission Staff	GREG TRAUTMAN Assistant Attorney General 1400 S. Evergreen Pk. Dr. SW P.O. Box 40128 Olympia, WA 98504-0128	(360) 664-1187	(360) 586-5522	gtrautma@wutc.wa.gov

PARTY	REPRESENTATIVE	PHONE	FACSIMILE	E-MAIL
Commission Advisory Staff	ANN RENDAHL (Admin. Law Judge)	(360) 664-1144	(360) 664-2654	arendahl@wutc.wa.gov
	KIPPI WALKER (Administrative Support)	(360) 664-1139	(360) 664-2654	kwalker@wutc.wa.gov

Dated this 19th day of April, 2007.



Susan M. Prudhomme
Davis Wright Tremaine LLP
Suite 2300
1300 SW Fifth Avenue
Portland, OR 97201-5682
(503) 241-2300