

**BEFORE THE WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY, INC.,

Respondent.

Docket No. UG-040640

**PETITION TO INTERVENE BY COST
MANAGEMENT SERVICES, INC.**

PETITION TO INTERVENE

1. Pursuant to WAC 480-09-430, Cost Management Services, Inc. (“CMS”) hereby petitions the Commission for leave to intervene in the above-entitled docket. As grounds for intervention, CMS states the following:

2. **Names and address of petitioner:**

P. Douglas Betzold
Chief Executive Officer
Cost Management Services, Inc.
2737 78TH Avenue, S.E.
Mercer Island, WA 98040

3. **Name and address of attorney representing petitioner:**

John A. Cameron
Davis Wright Tremaine LLP
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4. **Identity of petitioner:**

CMS markets competitively priced natural gas to industrial and commercial customers, some of which are located within the service territory of Puget Sound Energy, Inc. (“PSE”). These customers access CMS via the transportation option currently available under PSE Schedule 57.

CMS focuses its marketing efforts on a market segment consisting of businesses with significant gas consumption, but not sufficiently large to warrant in-house, energy-management expertise.

5. **The petitioner has the following interest in this proceeding:**

CMS customers comprise a discrete segment of the market for competitive gas supplies. They tend to have gas-consumption levels lower than the entities comprising the Northwest Industrial Gas Users group. CMS has participated as a party in prior PSE rate proceedings on competitive supply and transportation issues relating to its own interests and those of PSE's smaller commercial and industrial gas customers.

6. **The petitioner will raise the following issues in this case:**

CMS will focus principally, but not exclusively, on PSE Schedules 57, 85 and 87. It is concerned about the design of these PSE rate schedules, the terms and conditions of service, and the margins PSE earns and proposes to earn, under these schedules.

7. **Testimony of witnesses:**

If CMS submits written direct testimony or exhibits, its witness will likely be presented by its CEO, P. Douglas Betzold. Testimony from outside experts may also be considered. Petitioner also intends to cross examine the witnesses called by the other parties to this proceeding and to submit written briefs as appropriate.

8. **Request:**

CMS respectfully requests that its intervention in this proceeding be officially granted pursuant to WAC 480-09-430. Its interests cannot adequately be represented by any other likely participant in the case. Petitioner's knowledge of competitive gas-supply issues and its experience in prior PSE rate cases evidences that its participation in the case will serve the public interest. Participation by CMS will not unreasonably broaden the issues, burden the record, or

unreasonably delay this proceeding. CMS will abide by the procedural schedule adopted for this case.

WHEREFORE, CMS prays for leave to intervene as a party to this proceeding.

RESPECTFULLY SUBMITTED this 10th of May, 2004.

DAVIS WRIGHT TREMAINE LLP
Attorneys for Cost Management Services, Inc.

By: /s/ John A. Cameron
John A. Cameron
DAVIS WRIGHT TREMAINE LLP

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this 10th day of May, 2004, served the foregoing Petition to Intervene by Cost Management Services, Inc. upon parties of record in this proceeding, as follows:

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